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Resource Management Plan
Final Environmental Impact Statement

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FINAL

RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
FOR THE KEMMERER RESOURCE AREA

Lincoln, Sublette, Sweetwater, and Uinta Counties, Wyoming

Lead Agency: Bureau of Land Management, U.S. Department of the Interior

Type of Action: Administrative

Abstract:

The final resource management plan/environmental impact statement presents a proposed plan for managing approximately 1.6 million surface acres of public land and 1.8 million acres of federal mineral estate administered by the Kemmerer Resource Area of the Bureau of Land Management. The plan focuses primarily on resolving nine planning issues.

Six alternatives were examined in detail. Each of the six provided a different emphasis for managing the resource area and each resolves the planning issues in a different way.

When approved, the resource management plan will provide a comprehensive framework for managing the resources of the public land in the Kemmerer Resource Area during the next 10 years, or longer.

Further information regarding this document can be obtained from the address below.

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IN REPLY REFER TO:

United States Department of the Interior

Bureau of Land Management
Wyoming State Office
P.O. Box 1828
Cheyenne, Wyoming 82003

Dear Reader:

Enclosed for your review is the final environmental impact statement (EIS) and proposed resource management plan (RMP) for the Kemmerer Resource Area. This document presents the Proposed Plan for managing public lands and resources in the resource area. The Proposed Plan is a refinement of the preferred alternative presented in the draft EIS published in April 1985.

The draft EIS is an integral part of this planning document. The two documents together constitute the final EIS. The text and maps from the draft EIS are needed as reference for this document.

All parts of the Proposed Plan may be protested by parties who participated in the planning process. Protests should be sent to the Director (202), Bureau of Land Management, 1800 C Street NW, Washington, D.C. 20240. Protests must be postmarked before January 18, 1986, or 30 days after this final EIS is filed with the Environmental Protection Agency, whichever is later. The protests should include the following information:

The name, mailing address, telephone number, and interest of the person filing the protest.

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed plan is believed to be wrong.

At the end of the 30-day protest period, the Proposed Plan, excluding any portion under protest, will become final. Approval will be withheld on any portion of the plan under protest until final action on the protest has been completed. Any significant change made as a result of a protest will be made available for public review and comment before it is approved.

I want to personally thank those who have participated in the planning process. I hope your involvement will continue as we move forward to implement and monitor the plan and manage the public lands and resources in the Kemmerer Resource Area.

Sincerely yours,

Hillary A. Oden

State Director

Enclosure

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FINAL
ENVIRONMENTAL IMPACT STATEMENT/
PROPOSED RESOURCE MANAGEMENT PLAN
FOR THE
KEMMERER RESOURCE AREA
KEMMERER, WYOMING

Prepared by:

U.S. Department of the Interior
Bureau of Land Management

Hillary A. Oden 11-7-85

Wyoming State Director **Date**

SUMMARY

KEMMERER RESOURCE AREA

RESOURCE MANAGEMENT PLAN (RMP)

INTRODUCTION

The final resource management plan and environmental impact statement (RMP/EIS) present the Proposed Plan for managing approximately 1.63 million acres of public land and 1.87 million acres of federal mineral estate administered by the Kemmerer Resource Area (KRA) of the Bureau of Land Management (BLM).

The KRA includes the cities of Kemmerer and Evanston and surrounding areas of southwestern Wyoming; the Star Valley area to the north; small portions of Bear Lake County, Idaho; and a part of Rich County, Utah. The areas outside of Wyoming are managed for rangeland resources only.

HOW TO USE THIS DOCUMENT

The focus of this final RMP/EIS is on the Proposed Plan. This document presents a complete, comprehensive Proposed Plan for the KRA in Chapter II. Portions of the draft EIS have not been reprinted. This document should be used together with the draft EIS to get a full description of all alternatives and their potential environmental impacts.

The maps in Volume II of the draft EIS are an integral part of the Proposed Plan. They have not been reprinted for this document. The maps will be periodically updated as information changes so that the objectives of the Proposed Plan will not be jeopardized by outdated information. Discrepancies in the maps, brought to our attention during the public review period on the draft EIS, have been corrected.

The Summary from the draft EIS is incorporated by reference.

Chapter I of the draft EIS was not reprinted in this document. It describes the purpose of and need for the RMP, which has not changed. However, a corrected Figure 1-1 has been reprinted.

Chapter II has not been reprinted in its entirety. For a description of the alternatives considered, the reader should refer to Chapter II of the draft EIS. In this document, Chapter II contains a complete description of the Proposed Plan. Table 2-2 has been reprinted to reflect a minor change in the priority assigned to some grazing allotments. Other appendices related to rangeland management also reflect this change in priorities. We have also completed minor updating of information on some of the allotments. This is an ongoing process. The updated information has no bearing on the impacts presented in the draft EIS and the changes made are minor. Alternative E (BLM's preferred alternative in the draft EIS) was modified somewhat as a result of public comments. The changes are reflected in the Proposed Plan.

Chapter III has not been reprinted. It describes the Affected Environment. Several tables which were incorrectly printed in the draft RMP/EIS have been reprinted. For a description of the Affected Environment, the reader should refer to Chapter III of the draft EIS.

Chapter IV (Environmental Consequences) has not been reprinted. For a description of the Environmental Consequences by alternative, the reader should refer to Chapter IV of the draft EIS. The changes between the preferred alternative (Alternative E in the draft EIS) and the Proposed Plan (Chapter II in the final EIS) are not substantive relative to the objectives of the plan and are not expected to result in changes in impacts.

Chapter V describes the Consultation and Coordination that went on throughout the planning process. It has been updated and reprinted in this document.

Chapter VI is a new chapter. It presents comments from public meetings and from comment letters on the draft EIS. It also includes BLM's responses to those comments. In addition, it includes the Errata which are the minor changes to sections of the draft EIS and which were not reprinted.

Appendix B-1 has been changed and is printed in this document.

The Appendices, Glossary, Literature Cited, and the List of Preparers are incorporated by reference from the draft EIS.

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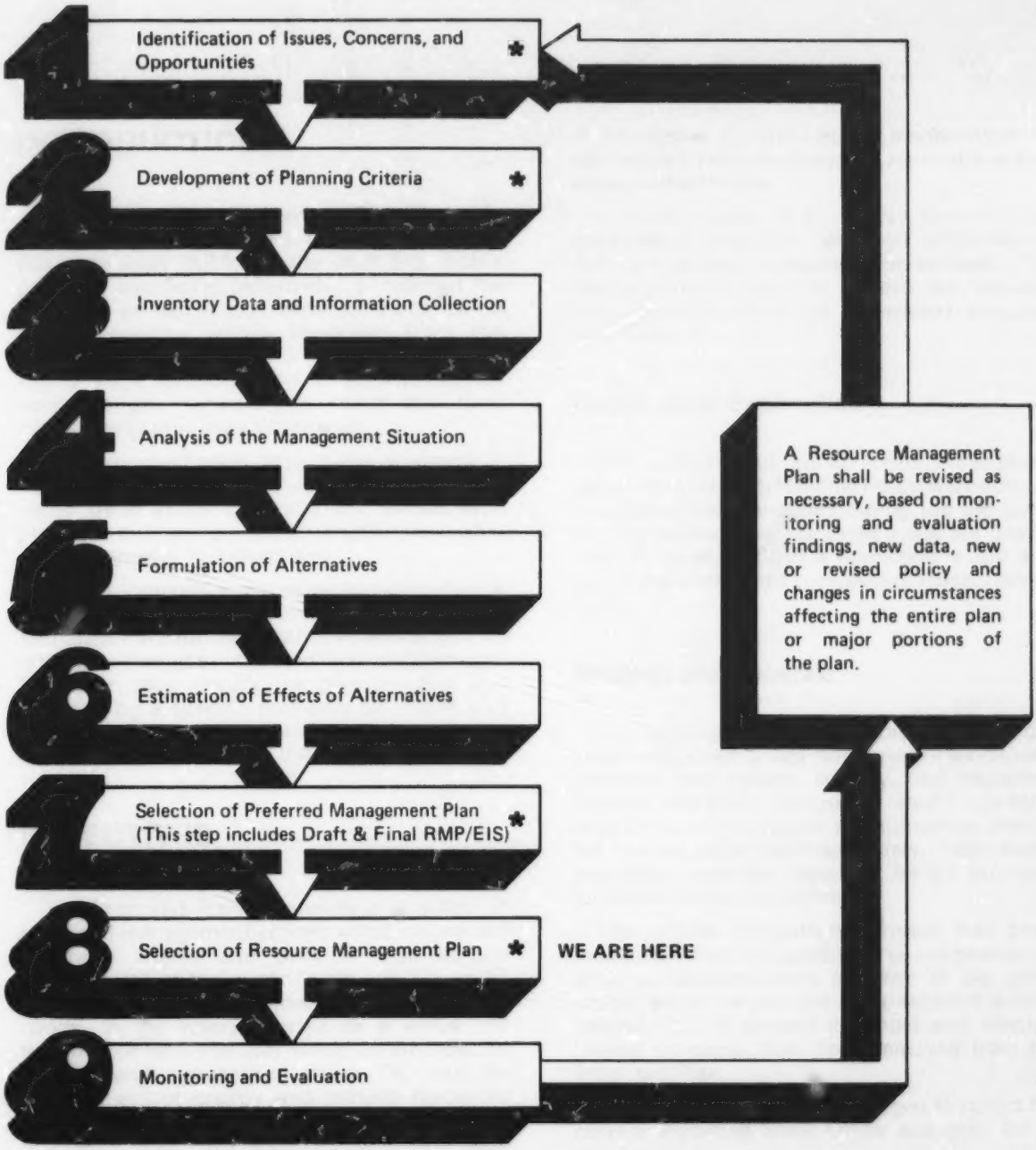


Figure 1-1
STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS

CHAPTER II

ALTERNATIVES

INTRODUCTION

The Proposed Plan is a comprehensive resource management plan (RMP) for the Kemmerer Resource Area (KRA). In the draft EIS, BLM's preferred alternative (Alternative E) referred the reader to an earlier alternative for guidance on some programs. In the Proposed Plan, the guidance from the draft EIS (under Alternative E and Management Common to All Alternatives) was brought forward to show the total management proposed by program.

Some reorganization among the programs is also reflected in the Proposed Plan. In addition, some general descriptions for bureauwide programs and background for the KRA have been deleted from the Proposed Plan.

Several changes were made to Alternative E between the draft EIS and the final EIS to formulate the Proposed Plan. These changes do not reflect changes in the objectives of Alternative E. Rather, they identify the objective that was intended by a specific provision (or restriction) or they reflect non-substantive changes in the approach used to achieve the same objective.

OBJECTIVES

The Proposed Plan represents a selection of proposed management actions which resolve the planning issues and provide multiple-use management of the public lands and resources in a combination that will meet present and future needs. In the resource area as a whole, no resource or resource user would be emphasized to the overall detriment of others. The need for development of energy and mineral resources would be met. Means to mitigate adverse impacts of development, without precluding it, have been identified.

MODIFIED PLAN ELEMENT

Alternative E from the draft EIS was chosen as the basis for the Proposed Plan. However, as a result of public comments and a thorough review of Alternative E, some minor modifications to Alternative E were developed. These modifications are explained below.

In some cases (e.g., under Geophysical Exploration) language has been added which defines a general objective to be achieved. The means currently used to achieve the objective (e.g., specific dates or distances) are also described.

Geophysical Exploration

The consolidated public lands immediately north of the Wasatch National Forest will be closed to geophysical operations during the big game hunting season because these areas are heavily used by hunters. Such a restriction would also match the restrictions on adjacent Forest Service lands.

Geology and Minerals

The language requiring operators in sour gas areas to establish onsite monitoring of windspeed, direction, atmospheric stability, and dispersion analysis, has been changed to require operators in such areas to prepare a contingency plan to help insure public health and safety. Public health and safety were the objectives for the provision identified under Alternative E.

The offsite mitigation concept has been modified. Offsite mitigation will be considered for large surface-disturbing activities in big game crucial winter ranges and other sensitive wildlife habitat. The 10 percent threshold and effective habitat concepts have been removed from the Proposed Plan.

Appendix B-1 has been changed to reflect the current Wyoming State Office approved list of stipulations.

Livestock Management

The priorities of the "I" category allotments were modified slightly. The new priorities are shown in Table 2-2.

The allotments that were to be combined under Alternative E are no longer planned for combination. The the Proposed Plan indicates that opportunities for combining allotments, or otherwise changing allotment boundaries, would be considered as they arise.

Land Resources

The Proposed Plan (Land Tenure Adjustment) has been modified to be consistent with the Wasatch-Cache Forest Land Management Plan. BLM will pursue the opportunity to enter into a cooperative agreement with the Forest Service to manage specified lands.

The Proposed Plan (Land Tenure Adjustment) was modified to say that lands not specified in the RMP as suitable for disposal would be reviewed on a case-by-case basis to determine if they meet FLPMA disposal criteria and if their disposal would be consistent with the objectives of the RMP. This is not a change in the overall objectives of the RMP. When a disposal action is found to be in conformance with the RMP, additional analysis will be completed prior to disposal to ensure that the responsible official has the pertinent information to make the decision.

Under Withdrawals and Withdrawal Reviews, additional language was added to explain that when withdrawals are revoked, and the lands are managed either as they were prior to the revocation of the withdrawal or managed consistent with the objectives of the RMP, that such management would be in conformance with the RMP.

Forestry Resources

There was controversy over a provision in the draft EIS which stated that "areas will be planted if adequate natural forest regeneration does not take place after 15 years. . ." The Proposed Plan was clarified to indicate that the objective is to get a fully stocked stand within 15 years. The area will be monitored after logging and may be planted prior to the 15-year period.

PROPOSED PLAN

The Proposed Plan was developed from Alternative E in the draft EIS. Alternative E was modified as a result of public comment. However, the objectives of the Proposed Plan have not changed from those of Alternative E.

Air Quality (Issue 2)

In general, the KRA will manage air quality to protect and enhance the resource through careful planning and coordination of its allocation with the State of Wyoming. Most specific stipulations will be deferred to the air pollutant emissions permit issued by the State of Wyoming.

Air resources will be protected in several ways. When sources of air pollutant emissions are proposed, special air quality protection related stipulations will be added to BLM grants of rights-of-way. The BLM will coordinate with the Wyoming Department of Environmental Quality, Air Quality Division (WDEQ, AQD) during the issuance of permits to construct facilities which would be emission sources. The emission of smoke from prescribed burning will also be coordinated with the AQD, with approval being granted by that agency.

The BLM will consider the potential impacts of the release of hazardous air contaminants. The accidental release of sour (H_2S rich) natural gas will be given special attention. A contingency plan will be required for Applications for Permits to Drill in sour gas areas. The contingency plan may include requirements for the monitoring of windspeed, direction, and atmospheric stability and for conducting a dispersion analysis. These requirements may be applied where public health and safety or important resource values are a concern. After reviewing a contingency plan, if BLM determines that additional data or safety precautions are needed, these items will be made conditions of approval. Public health and safety concerns will be considered during the permit process through reviews of these plans.

Bureau specialists will continue to collect basic climate and meteorological data. Examples of these data collection activities are remote automatic weather stations (24 hours a day for 365 days a year) and precipitation gauges. BLM will also collect atmospheric deposition (acid rain) data. These data will be used to determine actual or potential impacts resulting from air pollutant emissions and to provide information on proposed emission sources during the permit process.

Geology and Minerals

Geophysical Exploration (Issue 1)

Geophysical exploration for oil and gas will continue throughout the KRA. Geophysical operations will be conditioned to assure attaining the objective of avoiding undue adverse impacts to other important resource values and sensitive areas. The various restrictions identified below are complementary to the standards in Appendix B-1 and are not all-inclusive. They represent both actual requirements applicable to specific circumstances, and examples of requirements that will be considered and that may be applied as necessary.

Big Game Winter Range

The attainment of Wyoming Game and Fish Department big game population objectives will not be jeopardized. The most important parts of crucial big game winter ranges (areas 1-5 on Map B-1) will be closed from November 15 to April 30, without exception. The rest of the crucial winter range (colored or hash-marked areas on Map B-1) may be closed during the same dates. Proposed geophysical operations will be reviewed for appropriate application or modification of restrictions or requirements on a case-by-case basis.

Bald Eagle Roosting

Approvals of geophysical operations will be conditioned so that they would not adversely affect bald eagle roosting areas. A one mile buffer zone around bald eagle roosting areas (Map B) will be closed from December 1 to April 1.

Raptor Nests

No activity or surface disturbance will be allowed for up to a ¾ mile radius from active raptor nests from February 1 through July 1. Actual distances and dates will vary based on topography, species, season of use, and other pertinent factors.

Elk Calving

Elk calving areas (Map B) will be protected from disturbances during the calving period (May 1 through June 30). Elk calving areas will be closed during this crucial period. Geophysical operations proposed in elk calving areas during the crucial period will be reviewed for potential impacts to elk calving. If aerial flights or ground surveys indicate partial or no use by elk, geophysical operations may be allowed in areas not used for calving.

Sage Grouse

Conditions may include "no surface occupancy," timing, or seasonal restrictions in important or crucial sage grouse habitat areas.

Domestic Sheep Lambing

Domestic sheep lambing areas will be protected from disturbance during the lambing period. Only those parts of the lambing area in use will be closed from May 1 to June 20. The geophysical operator will be responsible for contacting the sheep permittees. The names, locations, addresses, and telephone numbers of permittees will be supplied by BLM when a Notice of Intent to conduct geophysical operations is filed.

Hunting Areas

Geophysical operations will not be allowed in the areas where there is heavy use by hunters and where public lands are relatively consolidated during the deer and elk seasons (which currently run from October 1 to October 31). The northern area closure (Map 4) is west of Slate Creek Ridge, west to the Wyoming-Utah and Wyoming-Idaho state lines, and north from the southern edge of the checkerboard land pattern to the Forest Service boundary and Salt Creek Canyon. In addition, the southern area closure is near the Wasatch National Forest and includes portions of Township 13 North, Ranges 113-116 West, and Township 12 North, Range 117 West.

Muddy Areas

Acceptance of geophysical operations will be conditioned so that additional erosion, lost vegetation cover, reduced water quality, etc., do not result from geophysical operations during periods of high soil moisture. During such periods, the BLM will temporarily close parts of the KRA to truck-mounted operations, including shot hole and vibration methods.

Riparian Areas

Generally, no surface disturbance will be allowed within 300 feet of perennial streams or

live water. Crossings of perennial streams will be minimized. This is especially important where there is a high density of riparian areas. The use of established roads, temporary bridges, or portable seismic operations (helicopter) will be preferred. When rehabilitation of a riparian area is required, the primary objective will be to stabilize soil and the reestablishment of riparian vegetation will always be a key objective. The desired plant species composition after rehabilitation will depend on site-specific objectives.

Exclosures

Approvals of geophysical operations proposed in areas adjacent to study exclosures will be conditioned to ensure that no damage occurs to the fence or to the interior of the exclosure. Entrance into the exclosure will be prohibited except for foot travel to lay out geophones.

Geologic Hazards

Areas of known geologic hazards will be avoided where possible (Map A). These areas will be considered in land use authorizations and appropriate mitigating measures will be developed.

Paleontological Resources

Authorizations for surface-disturbing operations will be conditioned to minimize adverse impacts to paleontological resources (Appendix B-1a). Operations causing disturbance in the Green River Formation will require a paleontological survey by a qualified paleontologist, and mitigating measures will be required, as appropriate. A paleontologist must have an approved permit from the Wyoming State Office of the BLM. Holders of authorizations for actions in all geological formations which may affect paleontological resources will be required to stop operations and contact BLM if paleontological or fossil resources are found. BLM will take appropriate action which may include requiring surveys and developing mitigation measures.

Threatened, Endangered and Sensitive Species

Appropriate measures to protect all threatened, endangered, and sensitive plant and animal species could include the use of "no surface occupancy" or "no surface disturbance" and seasonal restrictions. Such restrictions would apply to four sensitive plant populations of *Physaria dornii* (Figure 3-3) and an example of a cushion plant community containing five endemic plant species (Figure 3-4). The five areas contain less than 1,000 acres.

Oil and Gas (Issue 2)

Oil and gas leasing will continue throughout the KRA. As oil and gas leases expire, or otherwise terminate, the areas will, in most cases, continue to be re-offered for lease. No areas will be re-offered in the Raymond Mountain Wilderness Study Area (WSA) pending a Congressional determination on wilderness designation. If proposed lease areas are within a known geologic structure or KGS (an area known to be capable of producing hydrocarbons), they will be offered through the competitive leasing process. If they are not in a KGS, they will be offered through the simultaneous leasing process.

The objectives for managing the multiple resources in the KRA are defined throughout the RMP. The Soils section of the Proposed Plan describes reclamation requirements. The Wyoming BLM standard stipulations for surface disturbing activities (Appendix B-1) are also standard oil and gas lease stipulations. Restrictions to oil and gas activities will, generally, be selected from those standards. They will be developed and applied on a case-by-case basis and will vary depending on needs to achieve the basic objective of avoiding undue adverse impacts to other important resource values and sensitive areas. The discussion in the foregoing gephysical exploration section exemplifies the management objectives and the various types of restrictions and other considerations that will be applied to oil and gas activities. However, as specified in Appendix B-1, certain limitations may not apply to producing oil and gas wells. In addition, the provisions identified below are complementary to the standard stipulations and are not all-inclusive. They represent requirements applicable to specific areas or circumstances and other examples of requirements that will be considered and that may be applied, as necessary.

A no surface occupancy stipulation will be included on any lease issued in the Woodruff Narrows (800 acres) and Morgan Canyon (240 acres) bald eagle roosting areas (Map B), the Bridger antelope trap area (to protect fragile cultural resources), and threatened, endangered and sensitive plant sites (Figures 3-3 and 3-4). Surface disturbance would not be allowed in up

to a ¾-mile radius from any active raptor nest from February 1 to July 31. Big game crucial winter range areas would be protected from November 15 to April 30, and elk calving areas from May 1 to June 30.

No surface occupancy, timing. or seasonal restrictions may also be applied to important or crucial sage grouse habitat areas (e.g., lek sites and nesting areas). When a lease has a restriction to protect sage grouse habitat, modifications that may be applied on a case-by-case basis at the Application for a Permit to Drill stage include:

1. Surface disturbance may be allowed from June 1 to March 14 if the area could be returned to acceptable habitat (i.e., relatively flat with no obstructions) before March 15; or
2. A field exam could determine the specific area used for strutting, in which case the restriction would apply only to the actual lek site and a 500-foot buffer around the perimeter (when the actual lek boundary is not known, a ¼ mile radius from the lek center will be protected); or
3. Activities which do not disturb the surface would be allowed any time from June 1 to March 14. Activities which do not disturb the surface would be allowed from March 15 to May 31 from five hours after sunrise until two hours before sunset.

All leases, will include stipulations generally prohibiting surface disturbance within 500 feet of surface water or riparian areas; within important scenic areas; within a quarter mile or visual horizon (whichever is closer) from an historic trail; and on slopes in excess of 25 percent. Also, during periods when soil moisture is high, or when soils are frozen, or watershed damage is likely to occur, construction will be prohibited. Modifications to the limitations above may be approved in writing by the Authorized Representative of the BLM. For example, for slopes between 25 percent and 40 percent, an exception may be granted if a detailed mitigation plan is submitted and approved.

In the Raymond Mountain ACEC, generally no surface occupancy will be allowed within ¼-mile of perennial streams to protect the Bonneville cutthroat trout.

Offsite mitigation will be considered on all larger surface disturbing activities in big game crucial winter range areas (Map B-1) and other sensitive wildlife habitat areas. The requirement for offsite mitigation will be applied on a case-by-case basis depending on the type and duration of the disturbance and the sensitivity of the area affected. Offsite mitigation will generally not be required for exploratory wells or other short-term disturbances, unless cumulative impacts become a significant concern. Plans for offsite mitigation will be required on a site-specific basis and could include prescribed burning, brush-beating, and other methods designed to increase the productivity of wildlife habitat.

Applications for Permits to Drill (APDs) will be processed within the existing required time frames, with site-specific conditions added as needed (Appendix B-1a). Environmental analysis and extended processing time will be required for APDs on existing leases in the Raymond Mountain WSA.

Proposed drilling sites and access roads will be located, if possible, away from landslide-prone areas. Access roads will, if possible, be routed around the "minimize access" areas (see Land Resources).

A contingency plan will be required for APDs in sour gas areas. The contingency plan may include requirements for the monitoring of windspeed, direction, and atmospheric stability and for conducting a dispersion analysis. These requirements may be applied where public health and safety or important resource values are a concern. After reviewing the proposed contingency plan, if BLM determines that additional data or safety precautions are needed, these items will be made conditions of approval.

Conditions and mitigation measures (which are consistent with the objectives of the RMP) to protect wildlife will be added to APDs if similar stipulations are not on the lease.

Coal

A planning review of the 1982 coal management decisions was conducted for the purposes of this RMP. There were no changes in the 1982 decisions for unleased federal coal areas. The current decisions for managing the federal coal resource have been incorporated in this RMP (Appendix B-2).

Sodium

All lands within the Known Sodium Leasing Area (KSLA) are available for leasing consideration. The limited surface occupancy criteria contained in the Sodium Mineral Development Environmental Assessment and Stipulations Staff Report

will be applied on a case-by-case basis. Leases will be conditioned to ensure that unacceptable adverse impacts to other resources are minimized.

Prospecting permits within and outside of the identified geologically distinct area immediately surrounding the KSLA (i.e., the geologic basin occupied by Lake Gosiute during Eocene time) will be considered and conditioned consistent with the objectives of the RMP. Prospecting permits may be denied if it is determined that the impacts from exploration or development would be inconsistent with the objectives of the RMP.

Oil Shale

Areas which contain known deposits of oil shale are available for consideration for oil shale leasing.

Phosphate

Prospecting permits for phosphate will be considered in all areas. Appropriate stipulations will be added to protect other resources. Prospecting permits for phosphate (Map 12) may be denied if it is determined that the impacts from exploration or development would be inconsistent with the objectives of the RMP. For example, applications for prospecting permits in, or near, the Raymond Mountain WSA will be analyzed to ensure that there would be no unacceptable adverse impacts to other resources (e.g., ACEC or wilderness values). Leases would be conditioned to ensure that unacceptable adverse impacts to other resources are minimized.

Locatable Minerals

Mining claim locations are initiated by the claimant, and unless they are improperly located, they are accompanied by rights that cannot be overridden, including the right to mine the claim if a valid discovery exists. The BLM will continue to require a Notice or Plan of Operations (according to current regulations on areas greater than 5 acres) to describe mining proposals, help mitigate environmental impacts, and prevent unnecessary and undue degredation. Additional review in the Raymond Mountain WSA will conform to applicable regulations (43 CFR 3802) and guidelines.

Salable Minerals

Salable mineral permits will be processed on a case-by-case basis, with stipulations added to protect other resources.

Soils

General

BLM's activities associated with the soils resource will continue to be prioritized and based upon: 1) evaluation and interpretation of soils in relation to project design and development; 2) identification and inventory of soils for baseline data; 3) identification and implementation of methods to reduce accelerated erosion; and 4) provision of soil data in support of rangeland monitoring, inventory, and project design and development.

Management of the soil resource involves the evaluation and interpretation of soils to assist reclamation efforts (e.g., determination of topsoil depth) and to minimize erosion and sedimentation. Baseline data gathered through soil surveys will be used to determine potential productivity (range and forestry), soil engineering properties, and soil erosion potential.

Proposed "I" category allotments and areas impacted by proposed projects will receive priority for soil surveys. Soil surveys will follow the standards of, and contribute to, the National Cooperative soil survey.

Projects will be examined on a site-specific basis, evaluating the potential for soil loss and the compatibility of project design with soil properties. Stipulations and mitigating measures will be developed on a case-by-case basis to ensure soil conservation. Such measures may be applied to actions where surface-disturbing activities are authorized (see other sections of the Proposed Plan).

Development will be restricted in critical erosion areas and areas of geologic hazards. Watershed management will include the protection and enhancement of existing vegetation.

Reclamation (Issue 3)

The objectives for reclamation efforts emphasize: 1) stabilization through establishment of ground cover; 2) establishment of vegetation consistent with land use planning; and 3) reduction of visual contrast.

Reclamation of all rights-of-way for pipelines, roads, and power and communication lines will be required except for roads left intact for access purposes. Only areas needed for construction will be allowed to be disturbed. Reclamation (by the lessee or grant holder) will be expected as soon

as possible after a disturbance occurs. Continued efforts will be required until satisfactory vegetation cover is established and the site is stabilized.

Before a disturbance is authorized, the BLM will determine total topsoil depth. This depth, along with topsoil placement, will be specified in stipulations. Where possible, topsoil will be piled in a linear fashion, mulched as necessary, and seeded to reduce wind and water erosion and depletion of soil micro-organisms. Areas used for spoil storage will be required to be stripped of topsoil before spoil placement. The topsoil will have to be replaced after spoil removal. The distribution of topsoil uniformly over the area to be reclaimed will be required, unless conditions indicate varying depth.

The protection of trees, shrubs, and ground cover (not to be cleared from rights-of-way) from damage during construction will be required. Backfill will be required to be replaced in a similar sequence and density to preconstruction condition. The restoration of normal surface drainage will be required. A friable but firm seed bed will be required prior to seeding. Any mulch used will be free from mold, fungi, or noxious weed seeds. Straw mulch should contain fibers at least 8 inches long to facilitate crimping and provide the greatest cover.

Only plant species adaptable to local soil and climatic conditions will be utilized in revegetation efforts. Followup seeding or corrective erosion control measures will be required on disturbances which experience reclamation failure. All noxious weed infestation on surface disturbances will be the responsibility of the grantee or lessee. All noxious weed control will adhere to measures allowed in the Rock Springs District Noxious Weed Control EA or applicable updated guidance.

The placement of topsoil, seeding, and stabilization will be required on cut and fill slopes. Reclamation of abandoned roads will include reshaping, recontouring, resurfacing with topsoil, installation of water bars, and drill seeding on the contour. Fertilization or fencing of these disturbances will not normally be required but additional erosion control measures (e.g., fiber matting) may be required. Stripped vegetation will be spread over the disturbance for nutrient recycling, where practical. On all areas to be reclaimed, seed mixtures will be site-specific and will consist of species designed to achieve soil stability. Livestock palatability and wildlife habitat will be secondary considerations. Inter-seeding, secondary seeding, or staggered seeding may be required to accomplish this diversified goal.

Temporary disturbances which do not require major excavation (e.g., pipelines and communication lines) may be stripped of vegetation to mineral soil using mechanical treatment (e.g., brush beaters, mowers), leaving topsoil intact and root mass relatively undisturbed.

Roads

Recognized roads, as shown on the Rock Springs District Office Transportation Plan, will be used when the alignment is acceptable for the proposed use. Other roads will generally be required to follow natural contours; be constructed in accordance with acceptable standards; and be reclaimed to BLM standards. Cut and fill slopes will be seeded as soon as possible to avoid excessive erosion (except where bedrock surfaces). On permanent roads, topsoil will be used to establish vegetation on cut and fill slopes. Side casting of material on steep slopes will not be allowed. The removal of structures such as bridges, culverts, cattleguards, and signs will be required. Other requirements may include the obliteration of cuts and fills, construction of water bars, use of erosion control matting or mulch, and use of road barriers to discourage travel.

Well Pads and Plant Facilities

Abandoned sites must be satisfactorily rehabilitated (in accordance with a plan approved by BLM) by the lessee. Collection and analysis of soil samples may be required from disturbances to determine reclamation potential, appropriate reseeding species, and nutrient deficits. This will be the responsibility of the permittee or lessee. Testing (as determined by BLM) may include: pH, mechanical analysis, limiting salt content, and nitrogen, phosphorus, and potassium. Terraces or elongated water breaks will be required after slope reduction. Facilities will be required to approach zero runoff from the location until the area is stabilized (to avoid contamination downstream). All excavations, pits, or drill holes will be closed by backfilling and contouring to conform to the surrounding terrain.

On abandoned locations, the operator will be required to recontour, resurface with topsoil, and construct erosion and runoff control measures. If needed to produce adequate germination and growth, the topsoil would be reinoculated with soil micro-organisms and seeded. Fertilization may be required if there is evidence of a nutrient deficiency. The objectives for seeding will be first to stabilize soil (various grasses and forbs) and

then to obtain the desired vegetation density and diversity. Plant species composition will be determined by location (by BLM) and may favor either wildlife, watershed, or livestock. The site will be drill seeded or broadcast (if slopes exceed 30 percent or contain 35 percent surface rock content), then mulched, and fenced (unless deemed unnecessary due to low grazing pressure). Fencing will remain until reclamation is successful.

Snow fences, placed to increase snowfall depth over a reclaimed area, and reshaping to create shallow depressions (to catch surface runoff) may be required in areas receiving 10 inches or less of annual precipitation.

On well pads and larger locations, special attention will be given to parts of the surface use plan covering reclamation. The format and content outlined in Appendix C is an example format for satisfying these requirements.

On producing well locations, operators will be required to reduce slopes on unused pad portions to original contours (not to exceed 3:1 slopes), where practical; resurface with topsoil; construct water bars; seed with soil stabilizing species; mulch; and fertilize, if needed.

The development of well sites and facilities on 25 percent to 40 percent slopes (approximately 74,000 acres in the KRA) will be restricted unless erosion controls can be ensured and adequate revegetation is expected. Detailed engineering proposals and revegetation and restoration plans will be required in these areas. No surface occupancy will be allowed on slopes greater than 40 percent (approximately 68,000 acres in the KRA).

Pipelines and Communication Lines

Current road locations will be considered, in evaluating right-of-way proposals, to minimize surface disturbance. The compaction of backfill (not extending above the original ground level after the fill has settled), for ground stability, by tamping or by using a wheeled vehicle will be required. Water bars, mulching, and terracing will be required, as needed, to minimize erosion. Drop structures or small detention dams will be required in drainages crossed by a pipeline to prevent excessive erosion. Water bars will generally be constructed on the contour. Mulch will be required on all disturbed areas with a slope exceeding 15 percent. Mulch may include: native hay, small grain straw, wood fiber, live mulch, cotton, jute, synthetic netting, and rock.

The fencing of disturbed areas near livestock watering areas (distance determined on site-specific basis) may be required.

If linear facilities are to follow the same right-of-way for all or part of the route, they will generally be required to be constructed so that only one reclamation effort is required. Generally, they will be required to construct either concurrently or during the same field season.

Water Resources

Activities within the KRA will be managed to comply with state and Federal water quality standard.s. This will be accomplished by carefully reviewing proposed actions and developing mitigating measures to prevent degradation of the water resources. Actions involving municipal watersheds will be designed to protect and enhance water resources. Salinity problems in the Green River drainage will be a prime concern. Measures such as avoiding highly erosive areas, implementing zero runoff programs on large scale disturbances, and reclamation of all abandoned surface disturbances will be enforced. Watersheds in the Green River Basin will be sampled to identify salinity problems. Water quality plans will be developed to comply with the Colorado River Basin Salinity Control Act of 1974.

Potable groundwater supplies will be protected. Oil and gas wells will be cased below freshwater zones (less than 5,000 mg/l total dissolved solids) and cemented to prevent the contamination of aquifers. Exploration holes will be required to be properly plugged to prevent groundwater contamination. Authorizations for projects which may affect groundwater resources may be conditioned to perform both short-term and long-term monitoring to identify groundwater contamination.

Water quality monitoring (chemical and physical properties) will continue (including monitoring for oil and grease) on streams that drain the Overthrust.

Road planning, layout and construction, and other surface-disturbing activities, will be done in such a way as to reduce impacts to water quality and stream channels by reducing sedimentation. The downstream uses of the water and the maintenance of instream flows will be considered in evaluating projects and in developing mitigating measures to prevent degradation of water quality. Project planning will consider available water quality data from other agencies.

Livestock Management (Issue 4)

Weed and Pest Control

All noxious weed control will adhere to measures allowed in the Rock Springs District Noxious Weed Control EA or applicable updated guidance. Cooperation with county weed and pest control programs will continue.

Stock Trails

Adequate stock trails will be designated and maintained to support the livestock management program. Approximately 6,160 acres of public land designated as administrative stock trails will be retained. These trails will be maintained to provide access between public or private land permits or leases and Forest Service permits.

Predator Control

Predator control will continue in accordance with the Rock Springs District Animal Damage Control Plan. Animal damage control programs will be coordinated with the U.S. Fish and Wildlife Service.

Wild Horses

No herds of wild and free-roaming horses will be maintained in the KRA.

Allotment Categorization

Criteria have been developed to assist in placing allotments into these categories. Appendix A-5 describes the criteria and lists the KRA allotments by category. Appendix A-6 lists some potential management opportunities for each "I" category allotment.

Grazing Preference

Forage will be produced for livestock grazing and, at the same time, other resource values would be protected and enhanced. The overall objectives will be to improve range condition on "I" category allotments and to prevent declining conditions on other allotments to maintain a total active grazing preference of approximately 162,000 AUMs. A long-term increase of 31,901 AUMs, for a total of up to 193,901, AUMs could be realized through management actions shown in Appendix A-2. The increase would be allocated to competing resources (see Forage Increases).

Allotment Management Plans (AMPs)

New AMPs will be developed for 18 grazing allotments in approximately the order of priority shown in Table 2-2. Existing AMPs will continue to be followed on Willow Creek, Bench, Poison Creek, Beaver Creek, and Rock Creek allotments until monitoring and evaluation indicate that a change in management is appropriate.

TABLE 2-2

"I" CATEGORY ALLOTMENTS BY MANAGEMENT PRIORITY

Priority Ranking	Allotment Number	Allotment Name
1	1005	Smith's Fork
2	1206	Cumberland/Uinta
3	1035	Rock Creek
4	1113	Slate Creek
5	1324	Cottonwood Bench
6	1303	Lyman Cattle
7	1430	Willow Creek
8	1418	Bench
9	1042	Beaver Creek
10	1010	Poison Creek
11	1038	Dempsey Basin
12	1039	Fish Creek
13	1501	Medicine Butte
14	1413	Leavitt Bench
15	1437	South Horse Creek
16	1320	Leroy
17	1001	Trespass Creek
18	1002	Inchauspe
19	1441	Lower Cottonwood
20	1040	Pole Creek
21	1003	Hobble Creek
22	1036	Maytield
23	1048	Quakenasp Canyon
24	1302	Granger Lease
25	1449	Sage Creek
26	1317	Bridger Airport
27	1007	Sawmill Creek
28	1004	Preacher Hollow
29	1301	Cow Hollow
30	1318	Bigelow
31	1442	Crooked Canyon
32	1408	Poverty Flat
33	1304	Coyote Springs
34	1046	Trail Creek
35	1045	Lake Creek
36	1044	Granny Peak
37	1026	Lost Creek
38	1027	Underwood
39	1447	Highway

Proposed "I" category allotments and areas impacted by proposed projects will receive priority for soil surveys and range site inventories. Soil surveys will follow the standards of, and contribute to the National Cooperative soil survey.

Range Improvements

The "I" category allotments will have the first priority for the funding and implementation of range improvements (Appendix A-2). The "M" and "C" category allotments will have a lower priority than the "I" category allotments. Maintenance of range improvements will be assigned to the benefitting user. Partial fencing may be required around some reservoirs to allow establishment of shoreline vegetation for wildlife.

The benefit to cost ratio is 1.65:1 with a present net value of $1,030,690.

Forage Increases

Forage increases will be allocated to meet allotment objectives for all competing resources. In addition to providing for stability and growth in the livestock industry, forage increases will be allocated to meet the Wyoming Game and Fish Department's wildlife population level objectives, as well as all applicable watershed and soils objectives. The portion of the forage increase deemed available to livestock will be allocated according to 43 CFR 4110.

Combining Allotments

No allotments are proposed for combination. The adjustment of allotment boundaries (e.g., combination, division, boundary changes) will be considered as opportunities arise.

Rangeland Monitoring and Evaluation

The "I" category allotments will receive high intensity monitoring (climate, trend, utilization, and actual use). The "M" category allotments will be monitored at moderate intensity (climate, actual use, some trend, and utilization). Monitoring on "C" category allotments will be conducted at low intensity (climate, actual use, and limited utilization on selected key areas). Ecological site condition mapping will continue on "I" category allotments, consolidated, and checkerboard lands in that order.

Vegetation Manipulation

Approximately 82,610 acres of vegetation manipulation have been proposed. Vegetation manipulation will be designed to minimize adverse impacts to wildlife habitat and to improve it whenever possible. The objectives for vegetation manipulation in big game winter range may include the enhancement of livestock grazing, but the overall purpose will be to improve big game winter range. Projects in areas other than big game winter range may also have multiple objectives (e.g., reduce long-term erosion and sedimentation, improve wildlife habitat, increase livestock forage production etc.). The Wyoming Game and Fish Department will be consulted in advance on all vegetation manipulation projects.

Interagency Cooperative Management Plans

Cooperative management plans with the Forest Service may be developed on the Trespass Creek, Hobble Creek, Pole Creek, and Inchauspe allotments. Other cooperative management plans will be considered as opportunities arise.

Unallotted Public Lands

Approximately 4,500 acres of unallotted public lands which support roughly 646 AUMs could be made available for grazing. However, some of these lands may be disposed of through the Lands program.

Conversions in Kind

No conversions of sheep to cattle would be allowed in allotments with riparian problems without a plan to address riparian issues. Livestock conversions may be approved only after a study of the suitability for conversion. The conversion may be authorized if it is determined that the cattle would not increase adverse impacts to riparian habitats. Management actions and range improvements proposed (in the plan to address riparian issues) would have to be in place before a conversion is authorized.

Riparian Areas

Riparian issues will be addressed on all "I" category allotments during the development of monitoring or allotment management plans. Utilization of key riparian grasses will be set at

an appropriate level (not exceeding 60 percent). The desired utilization level for riparian areas on a pasture or allotment will be made a condition on the permit for each operator covered by the management or monitoring plan. If utilization is measured at a rate higher than the objective level, management changes would be required to reduce utilization to allowable levels. Changes may include salting, herding, fencing, water development, conversion from cattle to sheep, or a reduction in the authorized grazing use.

Fish and Wildlife Habitat (Issue 5)

General

Fish and wildlife habitat will be evaluated on a case-by-case basis as part of overall project planning. Such evaluation will consider the proposed project and the sensitivity of fish and wildlife habitat in the affected area.

Existing fences may be modified and new fences will be built to allow wildlife passage. Water developments generally will not be established for livestock where significant conflicts over vegetation would result (e.g., big game winter range). Whenever possible, water will be provided in allotments (including rested pastures) during seasonal periods of need for wildlife.

Management actions will be directed towards maintaining or improving riparian habitat condition by minimizing the impacts from surface disturbing activities in or near the riparian zone through the use of avoidance; crossing on temporary or permanent bridges or culverts; and reclamation to promote native riparian vegetation. Authorizations for logging and road construction will be addressed on a site-specific basis and will take wildlife and riparian values into consideration.

Habitat Improvement

Water for antelope, sage grouse, and livestock will be provided in the Opal and Chrisum bench areas. Big game winter range will be improved using mechanical treatment, burning, or other vegetation manipulation methods. This includes all big game winter range in need of habitat improvement. Big game winter range in the Rock Creek, Slate Creek, Leroy area, Crawford Mountains, and Bear River Divide areas will receive high priority. Seasonal closures for motorized vehicles may be used to protect big game winter range.

Riparian and Wetland Areas

Management actions in riparian areas and wetlands will include measures to preserve, protect and, if necessary, restore natural functions (Executive Orders 11988 and 11990). The objectives will be to minimize the degradation of stream banks and the loss of riparian habitat. Bridges and culverts will be designed and installed to maintain adequate fish passage and to prevent headcutting.

Riparian areas will be managed to re-establish riparian/willow vegetation in the Thomas Fork drainage. Wetland areas will be improved for waterfowl production and sage grouse brood rearing areas. Stream improvement practices to improve riparian and wetland areas for fisheries habitat will be implemented.

Threatened and Endangered Species

No activities that would jeopardize the continued existence of threatened and endangered (T&E) species will be allowed in habitat for those species. The Wyoming Game and Fish Department and the U.S. Fish and Wildlife Service (USF&WS) will be contacted prior to implementing projects that may affect habitat for threatened and endangered species. If a "may effect" situation is determined through the BLM biological assessment process, formal consultation with the USF&WS will be initiated (Section 7 of the Endangered Species Act of 1973, as amended).

Habitat Management Plans (HMPs)

Existing and proposed HMPs are described below. Additional HMPs may be developed as opportunities arise.

The Thomas Fork HMP will continue to be implemented to improve habitat for the Bear River cutthroat trout and to maintain or improve associated riparian areas in the Thomas Fork drainage. This activity plan will be updated in fiscal year 1986.

The objectives of the existing Rock Creek HMP are to improve habitat condition for mule deer and elk in the Rock Creek winter range. Specific actions will either be implemented in their present form or will be modified through coordination with the Wyoming Game and Fish Department (Sikes Act HMP).

The objectives of the proposed Woodruff Narrows mitigation plan will be to improve riparian

habitat used as a bald eagle winter roost and to mitigate possible habitat loss from the construction of a low head hydropower plant. It will be a cooperative effort among BLM, WGFD, USF&WS, and Wyoming Hydro (the licensee).

The proposed Overthrust HMP will address impacts to important wildlife habitat from energy development and associated activities within the Overthrust Belt. A primary objective will be the enhancement of big game habitat.

The proposed Cumberland Wetlands HMP will be directed at improving waterfowl production and wetland habitat in selected drainages and reservoirs in the Cumberland Valley south of Kemmerer.

The objectives of the proposed Kemmerer Riparian HMP will be to complete inventory of potential fisheries habitat, and to prioritize and implement restoration efforts. Its main goals would be to improve bank stability and associated riparian vegetation, to reduce sedimentation, and to increase fisheries values.

Inventory and Monitoring

Important wildlife habitat will be monitored to determine seasonal habitat use and identify areas in need of habitat improvement. These areas include big game winter ranges, riparian areas, sage grouse strutting and nesting areas, wetlands, T&E species habitat, and non-game habitat. These data would be used to reach site-specific management decisions. For example, the application of a wildlife restriction on geophysical exploration may vary depending on the location of wintering big game.

Inventories to locate important wildlife habitat will be conducted as funds are available. Priority will be given to T&E species, especially black-footed ferrets. Surveys will be conducted in areas with a relatively high probability of supporting ferrets, such as locations with recent sightings, physical evidence, or a high population of prairie dogs. Other wildlife habitat lacking complete information in the KRA include raptor nest sites, sage grouse strutting grounds, and site-specific vegetation data.

Recreation (Issue 6)

General

Management activities will ensure the continued availability of outdoor recreation opportunities sought by the public and which are not readily available from other public or private entities. Additional goals include protecting resources, meeting legal requirements for visitors health and safety, and mitigating resource user conflict involving recreation.

The KRA has three hunting outfitters with special recreation use permits operating in the Raymond Canyon and Upper Smiths Fork areas. All such permit applications will continue to be processed on a first-come first-served basis.

Recreation Area Management Plans (RAMPs)

A recreation area management plan is being developed for the Oregon and Mormon Trails and the major cutoffs that traverse the KRA. The cultural aspects, recreation opportunities, and management prescriptions will be identified in the plan to ensure that the trails' values are protected.

Recreation development (e.g., trails, picnic facilities, etc.) will proceed in the Raymond Mountain Area, Pine Creek, Dempsey Ridge, Commissary Ridge, Upper Hams Fork, and Upper Smith's Fork areas. Three RAMPs will be developed for prime areas of recreation potential.

Recreation Potential

Areas with recreation potential will be managed to protect the recreation values. The recreation potential for future development (Appendix H) will continue to be monitored, evaluated, and updated. When proposed actions for other programs are evaluated, the sensitivity and potential of recreation resources in the affected area will be considered. Stipulations will be developed for projects in other programs to assure compatibility with recreation management objectives including, the potential for recreation development. Other kinds of projects may be used to facilitate the use of recreation resources. For example, access roads may be rerouted to either provide access to recreation resources or to avoid adverse impacts to recreation values.

Visual Resources

Visual resources will continue to be evaluated as part of activity and project planning. Visual resource management (VRM) classes will be updated as situations change so that appropriate baseline information is included in project level planning. Such evaluations will consider the need for the proposed project and the visual sensitivity

(e.g., VRM classification) of the area. Stipulations will be attached to ensure compatibility of projects with management objectives for visual resources. Generally, activities within VRM classes of I through IV will be allowed only when the activity complies with the constraints identified for each VRM class. However, the incompatibility of a specific action with an area's VRM classification would not, in and of itself, constitute non-conformance with the RMP because the management objectives for other resources will also be taken into account.

Large, long-term facilities will be required to be colored to blend with the natural environment when this is not in conflict with safety or with the purpose for which the facility has been designed.

Off-Road Vehicles (ORVs)

Most of the KRA (1,600,054 acres) will be designated "limited" to existing roads and trails except for necessary tasks. In the Raymond Mountain WSA, 32,946 acres will be designated as "closed."

The KRA will remain open to snowmobile use except that the Rock Creek and Slate Creek elk winter ranges (Map B-1) may be closed to minimize stress to wintering big game (subject to a year-by-year analysis).

Roads that will be closed are: a one mile segment of the Westfall Hollow area; a three-mile segment of the rock slide area of the Sublette Cutoff of the Oregon Trail; a two-mile segment of the Dempsey-Hockaday Trail on the east side of Commissary Ridge; and the Slide Rock Trail. Except for the main access road to Nugent Park, all roads north and west of the Pine Creek Road intersection on Dempsey Ridge (into the Slide Rock Trail area) will be permanently closed to protect elk calving areas and watershed values.

The ORV designations will match Forest Service designations at the boundary of the Bridger-Teton and Wasatch National Forests. A "limited" designation on BLM lands would be compatible with the Bridger-Teton. The Wasatch designations would require different restrictions. The public lands in Sections 25, 26, 32, 33, and 34 of T. 13 N., R. 116 W., would comply with USFS Designation 3 (open to motorized wheel vehicles on designated roads, closed to over-the-snow machines operating on snow). Section 30 of T. 13 N., R. 115 W. would also be designated to conform with the USFS Designation 3. Sections 24, 26, 27, and 34 of T. 13 N., R. 115 W. would be designated to conform with the USFS Designation 5 (open to over-the-snow machines on designated routes only, open to motorized wheel vehicles on designated roads). Section 19 of T. 13 N., R. 114 W., would also be designated to conform with the USFS Designation 5.

Raymond Mountain Wilderness Study Area (WSA)

The Raymond Canyon Trail will continue to remain open to foot traffic, horses, etc. It will be closed to ORV use. The trail will be maintained in a manner conducive to public health and safety.

Legal access to Raymond Canyon will be sought. The canyon area will be closed to ORV use except for over-snow vehicles.

The Raymond Mountain area will continue to be managed in compliance with the Interim Management Policy until Congress determines its wilderness designation. A Department of Interior Secretarial decision prohibits issuing new leases for oil and gas in a WSA. The primary objective for the Raymond Mountain area will be to preserve its wilderness values.

A RAMP will be developed for the Raymond Mountain WSA. The RAMP will consider current and anticipated recreation use levels, activities, and areas of concentration. BLM will enhance the outdoor recreation experience and protect the resource by providing access and collecting visitor use data.

The Raymond Mountain ACEC plan will continue to be implemented. If the area is not designated as wilderness, stipulations will be applied to oil and gas leases to provide maximum protection of recreational and wildlife values in the ACEC area.

Land Resources

Land Tenure Adjustment (Issue 7)

Field studies and site-specific analyses will be conducted prior to disposal. There are two steps involved in identifying a parcel for disposal. The first is the initial categorization for disposal or retention. This is a screening process that separates the land suited for retention from that which may be suitable for disposal under criteria defined in Section 203 of FLPMA. Lands which meet the disposal criteria of Section 203 of FLPMA are analyzed on a site-specific basis under NEPA requirements.The types of land tenure adjustment actions considered are sale, R&PP leases or

patents, exchanges, and transfer for management by other federal agencies.

The priority land disposal area is the 3,800 acres of BLM-administered land in Star Valley.

BLM-administered lands in the remainder of the KRA will be considered for sale on a case-by-case basis. In 1982, the KRA identified 53,468 acres of public land (Appendix D) that appear to meet FLPMA sale criteria. The disposal of other lands will be considered on a case-by-case basis to determine if they meet FLPMA criteria for disposal and if their disposal would be in conformance with the objectives of the RMP. Sale of these lands will be based upon public demand and may occur as budget allows.

The BLM will pursue the opportunity to enter into an Interagency Agreement with the Wasatch-Cache National Forest to manage the public lands within the following area: starting at the point where public land and National Forest land join on Hickey Mountain, follow the Hickey Mountain ridge northeast to Lonetree Road, Wyoming 414, then north on this road to Mountain View. Then follow the Robertson Road, Wyoming 410 south and west to Jones Creek. Then follow unimproved road southwest 3-½ miles to state section 36, then south one mile to SE corner of section 36, then west six miles to SE corner of section 36, T. 14 N., R. 117 W., then south to state line, then east along the state line and National Forest boundary to starting point.

Rights-of-Way (Issue 8)

Rights-of-way will be issued incorporating surface reclamation stipulations (see Soils) and other mitigating measures (see other sections of the Proposed Plan e.g., Geophysical Exploration). Modifications of seasonal stipulations will be considered on a case-by-case basis.

All existing communication site rights-of-way will be modified to allow subgranting to new users.

Known threatened and endangered species habitat and raptor nesting sites will be designated "no surface occupancy" or will have seasonal restrictions. Rights-of-way will normally be routed around these areas (Map B), if possible, or seasonally restricted. Crucial wildlife habitat areas will be designated "minimal access areas."

If linear facilities will follow the same right-of-way for all or part of the route, they will generally be required to be constructed so that only one reclamation effort is required. This will generally mean that they will be constructed either concurrently or during the same field season.

To facilitate revegetation of non-linear rights-of-way sites, the sites will be fenced (where feasible) to prevent livestock grazing from impacting new vegetation. Attempts will be made to block linear rights-of-way to vehicle use.

Temporary Use Permits

Temporary use permits (TUPs) will be considered for areas to be used only during construction or for other short-term needs.

Recreation and Public Purposes (R&PP) Act

R&PP leases and patents will be considered as the need arises. Present BLM policy is to make public land available and to assist local governments to develop the necessary paperwork to accomplish the issuance of R&PP leases and patents.

Exchanges

Land exchanges will be considered as opportunities arise. Analyses completed in connection with exchange proposals will include a determination of whether the public interest will be served by completing the exchange. The determination will consider better federal land management and the needs of state government and local communities (e.g., economy, community expansion, recreation).

Withdrawals and Withdrawal Reviews

The BLM will complete a review of all existing withdrawals to determine if they should be continued or restored to management under the public land laws. Withdrawals that are not necessary to protect public land values are generally revoked and the public lands are restored to full operation under the public land laws. If a withdrawal is revoked, either (1) the management prior to revocation of the withdrawal would be continued, or (2) the area would be managed consistent with the objectives of this RMP.

New withdrawals will be considered as the need arises. An analysis will be completed to determine how present land users will be affected by the proposed use and the compatibility of existing and potential resource uses with the proposed use.

Other Land Actions

Desert Land Entries (DLE) will be considered as needs arise.

Color of Title

An applicant who has satisfied all requirements for a claim of Class 1 or Class 2 will receive patent to the land upon payment of the fair market value less the value of the improvements.

Leases/Permits/Easements

Leases, permits, and easements are surface use authorizations for uses that are not specifically authorized under other public land laws and not specifically forbidden by law (43 CFR 2920). These use authorizations will be issued with appropriate conditions to protect other resources and resource uses (see other sections of the Proposed Plan).

Unauthorized Occupancy

BLM will continue to take action against any cases of unauthorized occupancy.

To prevent the development of occupancy trespass, energy project proponents may be required to provide crew quarters on or near the construction site.

Access (Issue 9)

High priority areas for access acquisition will be the Meeks Cabin area in support of the forestry program. Legal access to the mouth of Raymond Canyon will be sought to provide access to the mountain. Other needs will be identified as site-specific management plans are developed (e.g., for areas where RAMPs will be prepared or where recreation potential has been identified).

During oil and gas operations, roads will be considered for long-term support of all programs. Access will be sought across private land if a need is identified. If a decision is made to have a road restored, it would be reclaimed (see Soils).

Legal access will be sought to areas which will be intensively managed for timber production. Temporary easements may be used for specific actions for short time periods.

Forestry Resources

The KRA's objective will be to meet public demand for forest products.

Clearcuts will generally be limited to no more than 25 acres in size. Exceptions may be made with State Office approval (e.g., for insect or disease infestations). Clearcuts will be laid out considering stand characteristics, topography, and other resource values.

Areas of new seedling establishment will be inventoried at specified intervals; areas not meeting stocking standards will be reforested using native species. Silvicultural treatments will be identified for specific areas to improve the stands. Treatment could include burning, chaining, cutting, or shearing. Rehabilitation surveys will be conducted on old logging and fire areas to determine if regeneration is sufficient to ensure proper stocking of a new timber stand. The effects of grazing will also be assessed and remedial action may be taken (e.g., fencing) to protect reproduction. The objective is to achieve a fully stocked stand within 15 years. When, prior to 15 years, it is apparent that natural regeneration will not result in a fully stocked stand and funding is available, the area will be planted. Natural regeneration normally takes from 5 to 9 years to get a stand fully established.

Forest management practices will be directed to prevent insect or disease infestations.

Road development will be kept to a minimum. Road locations and specifications will be selected to meet transportation needs, safety requirements, and consideration of other resource values. Timber harvest and associated activities will be planned in a sequence that will be least disruptive to wildlife. An engineering analysis will be required where road grades exceed 10 percent. Roads will be routed away from areas that are likely to slump or slide (Map A). Cross drain culverts, water bars, or ditches will be installed, as needed to prevent erosion or washing away of the road. Temporary roads will normally be rehabilitated and closed after logging.

The selective tree method or partial cutting will be the preferred harvest method adjacent to live water. Adequate protection to the water will be provided through timber sale contract stipulations. All timber sales will be designed to perpetuate forest cover and to provide adequate security and thermal cover for wildlife.

The disposal of logging residue through firewood sales is the preferred method of reducing residue accumulation. Some residue may be burned to provide an adequate seedbed for seedling establishment and survival.

Timbered areas adjacent to previously harvested areas will generally not be harvested until adequate regeneration is established.

Normal operating seasons for timber harvest activities are about June 30 to December 1. Harvest activities may be shut down due to wet soil conditions to prevent soil compaction or rutting. Under favorable conditions, winter logging may be allowed.

Harvesting timber on slopes exceeding 45 percent will be restricted to cable logging, horse logging, or similar methods. Rubber tire or track skidders will not be allowed.

Forestry activities will provide for protection of water quality and riparian areas. Bridges, culverts, or low water crossings (where a substantial stream bottom of rock or concrete is installed) will be required for crossing perennial streams. During the development of a timber harvest proposal, an adequate buffer strip will be left around live streams to prevent water quality deterioration.

Cultural and Historic Resources

For most surface-disturbing activities, an inventory to locate and evaluate cultural resources (including both historic and prehistoric sites) will be performed. A qualified archaeologist (permitted by BLM) will be required to conduct an on-the-ground survey.

The preferred strategy will be to avoid a cultural site, preserving it and the data it contains, in situ. Site avoidance is usually attained by project redesign. When avoidance is not feasible, other mitigation strategies may include: mapping and collecting of surface material; evaluative testing (small-scale excavation) to determine the nature of the subsurface materials; data recovery through mitigative excavation (larger scale); photography, archival or other records research; and analysis and report preparation.

Historic Trails

The management of historic trails will emphasize preservation coupled with increased visitor use and appreciation of the trail system. Generally, to provide a protective corridor for the trail, no surface disturbance will be allowed within 1,320 feet from either side of a historic trail (may depend on topography and existing surface disturbance).

Three elements relating to trail significance are: intact physical remains (e.g., trail ruts, campsites); integrity of natural setting; and good historical association (presence of archival verification of location of trails or other historic sites such as stage stations, graves, etc.). These and other guidelines will be considered for decisions that may affect historic resources. Since historic travel routes (Map 2) on the public lands are abundant and of national significance, the BLM is preparing a comprehensive Historic Trails Management Plan. This plan will outline how most BLM-administered historic trails in the KRA will be managed.

Historic Sites

All significant historical, archaeological, and cultural sites will be protected or mitigated. Erosion on Johnston Scout Rock will be stabilized. Title to Emigrant Springs (Slate Creek) will be sought. Interpretive signing will be developed. The trail register will be stabilized and preserved. A campground at Emigrant Springs (Dempsey) will be considered as a part of total development. Interpretive signs will be placed at the Alfred Corum gravesite and at nearby ruts of the Oregon Trail.

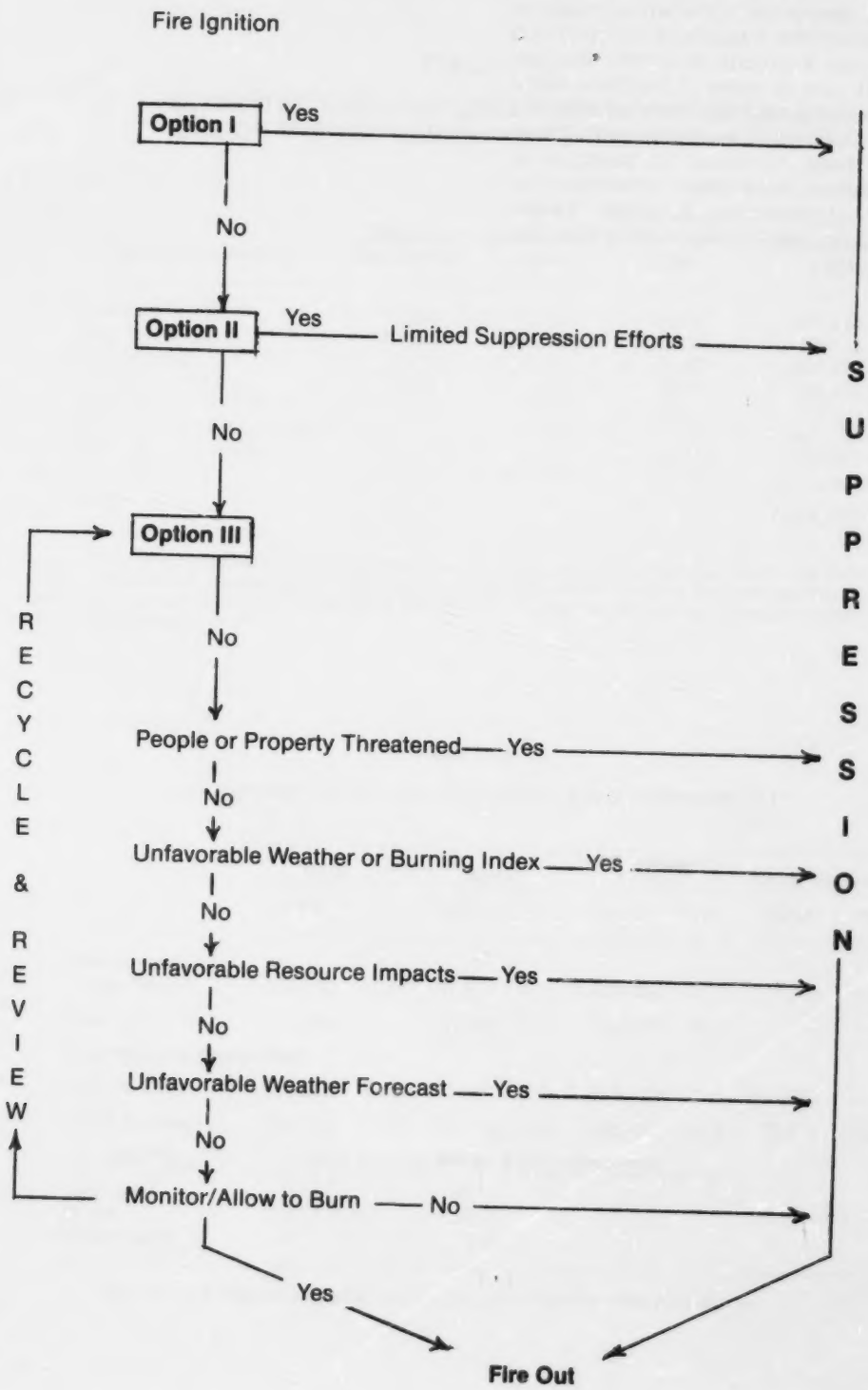
Fire Management

The KRA is divided into nine fire management areas (Map 8) that share common management objectives, topographic boundaries, or land ownership patterns. Each area is described in Appendix E-1. Fire suppression efforts within these areas will be driven by property threatened or resource benefits derived. All new developments that could be damaged by wildfire will have a fuel break stipulation to prevent the spread of fire from adjacent vegetation to the development.

The decision process for fire suppression is shown in Figure 2-1. If a need for full suppression is clearly indicated (Option I), suppression procedures are initiated. If full suppression is not warranted and there are limited benefits to be derived from fire (Option II), the costs of suppression versus expected benefits are

FIGURE 2-1

FIRE MANAGEMENT DECISION CHART



analyzed. This may result in limited suppression efforts. When fire may result in important resource benefits (Option III), four primary parameters will be evaluated to determine if fire would result in potentially unacceptable impacts or in conditions which would make it difficult to control the fire. If at some point, one or more of the parameters becomes unfavorable, management of the fire would revert to Option I (full suppression). These parameters include: 1) threat to persons or property, 2) adverse weather conditions or forecast, and 3) resource impacts. These parameters will be monitored throughout the course of the burn.

CHAPTER III

AFFECTED ENVIRONMENT

TABLE 3-14

ESTIMATED EXPENDITURES FROM RECREATIONAL USE OF THE KEMMERER RESOURCE AREA IN 1982

Recreation Activity	Estimated Population	Recreation Days	Expenditures Per Day[1] ($$)	Total Expenditures ($$)
Antelope Hunting	10,230	4,972	125.04	621,698.88
Deer Hunting	35,850	33,313	64.18	2,138,028.34
Elk Hunting	2,710	17,202	76.42	1,314,576.84
Moose Hunting	1,300	935	99.60	93,126.00
Black Bear Hunting	125	626	8.28	5,183.28
Birds & Waterfowl Hunting		14,090	27.76	391,138.40
Small Game Hunting		8,518	78.69	670,281.42
Fishing		80,000	32.18	2,574,400.00
Total				**7,808,433.16**

[1] Expenditures per hunter and fisherman are reported by the Wyoming Game and Fish Department, Annual Report 1983. Expenditures per general recreation day were the results of a survey conducted by Walsh et al. 1981 and updated to 1982 dollars by the consumer price index.

TABLE 3-15

KEMMERER RESOURCE AREA LAND OWNERSHIP

	BLM		State		Private		Other Federal	
	Acres	%	Acres	%	Acres	%	Acres	%
KRA (excluding Star Valley)	1,628,650	50.8	137,510	4.3	1,432,000	44.7	8,000	0.2
Star Valley	4,480	3.4	4,380	3.4	129,800	93.2	—	—
County Land Ownership								
Lincoln County[1]	1,015,966	38.3	123,203	4.7	596,753	22.5	913,381	34.5
Uinta County[1]	538,775	39.2	53,376	3.9	746,497	54.2	36,777	54.2
County	**% of County Within KRA Boundaries**							
Lincoln			49.7					
Uinta			89.7					
Sweetwater			6.3					

[1] This refers to the entire county, not just the part within the KRA boundaries.

TABLE 3-21

TAXABLE MINERAL PRODUCTION IN LINCOLN, SWEETWATER, AND UINTA COUNTIES AND THE STATE OF WYOMING

	Coal (tons)		Trona (tons)		Oil (Bbls)		Natural Gas (MCF)	
County/State	**1977[1]**	**1982[2]**	**1977[1]**	**1982[2]**	**1977[1]**	**1982[2]**	**1977[1]**	**1982[2]**
Lincoln	5,083,240	4,314,363			132,234	240,021	11,167,328	21,937,007
Sweetwater	7,191,938[3]	10,828,045[3]	11,771,985	10,073,690	9,959,104	8,737,658	115,087,044	104,279,682
Uinta					3,633,587	7,934,059	22,949,460	32,929,608
Wyoming	68,792,573	104,014,096	11,771,985	10,073,690	115,678,022	108,055,462	333,332,180	351,192,737

[1] Mineral Division of Wyoming Department of Economic Planning and Development 1980, Wyoming Mineral Yearbook 1980, Cheyenne, Wyoming.

[1] Mineral Division of Wyoming Department of Economic Planning and Development 1983, Wyoming Mineral Yearbook 1983, Cheyenne, Wyoming.

[3] None of this coal was produced in the KRA.

TABLE 3-24

LABOR AND PROPRIETORS AND PER CAPITA PERSONAL INCOME FOR LINCOLN, SWEETWATER, AND UINTA COUNTIES (Reported in Thousands of Dollars)

	Lincoln			Sweetwater			Uinta		
	1971[2]	1976[3]	1981[3]	1971	1976	1981	1971	1976	1981
Wage and Salary Disbursements	27,241	42,048	91,969	51,497	217,450	509,977	15,325	27,033	127,342
Other Labor Income	1,429	3,899	8,233	2,698	13,819	31,653	618	1,483	7,392
Proprietors Income	5,743	5,679	5,355	4,325	10,029	12,112	3,342	2,304	2,384
Farm	4,102	768	-1,282	2,199	-17	-1,197	2,252	-548	-968
Nonfarm	1,641	4,911	6,637	2,126	10,106	13,309	1,090	2,852	3,352
Earnings by Industry									
Farm	5,383	2,133	1,016	3,233	720	155	2,775	183	267
Nonfarm	29,030	49,493	104,541	55,287	240,578	553,587	16,510	30,637	136,851
Private	24,247	42,510	91,330	46,540	218,004	506,114	10,334	21,068	117,530
Ag. Serv., Forestry, Fishing	(D)	319	862	(D)	91	(D)	(D)	70	(D)
Mining	2,626	16,840	40,852	16,826	93,692	236,168	(D)	1,902	45,648
Construction	(D)	5,700	11,219	4,400	54,909	97,494	916	1,418	10,659
Manufacturing	1,629	3,103	7,328	1,631	4,650	11,781	(D)	1,364	3,048
Non-Durable Goods	[1]	932	3,034	[1]	3,518	7,451	[1]	34	(D)
Durable Goods	[1]	2,171	4,294	[1]	1,132	4,330	[1]	1,330	(D)
Transportation	3,338	6,965	(D)	8,403	21,586	57,613	4,453	7,608	20,594
Wholesale Trade	1,787	2,132	(D)	1,334	6,788	(D)	0	525	(D)
Retail Trade	2,103	4,172	6,183	6,372	17,684	37,240	2,625	5,243	13,850
Finance, Insurance, Real Estate	605	1,341	3,146	(D)	3,652	7,257	342	682	3,473
Services	1,503	1,938	4,766	6,481	14,952	(D)	(D)	2,256	(D)
Government	4,783	6,983	13,211	8,647	22,574	47,473	6,176	9,569	19,321
Federal Civilian	1,447	1,100	2,061	1,737	3,672	5,940	552	1,069	1,521
Federal Military	226	173	231	489	555	790	170	159	247
State and Local	3,110	5,710	10,919	6,421	18,374	40,743	5,454	8,341	17,553
Per Capita Personal Income (Dollars)	[4]	**6,101**	**9,963**	[4]	**7,827**	**13,363**	[4]	**4,922**	**9,765**

(D) Indicates the data is not printed due to disclosure.

[1] Durable and nondurable goods are included in the total for manufacturing.

[2] Wyoming Department of Administration and Fiscal Control 1983, Wyoming Income and Employment Report, Division of Research and Statistics, 5th edition, June 1983.

[3] Bureau of Land Management 1982, Rock Springs District Social Economic Profile, Updated and Revised in 1982.

[4] Data were not available.

CHAPTER V

CONSULTATION AND COORDINATION

INTRODUCTION

The Kemmerer Resource Area (KRA) resource management plan (RMP) was prepared by an interdisciplinary team of resource specialists from the resource area, the Rock Springs District Office, and the Wyoming State Office. Consultation and coordination with agencies, organizations, industry, and key individuals has occurred in a variety of ways throughout the RMP planning process. Public meetings, informal meetings, individual contacts, letters, and Federal Register notices have been utilized to involve the public in the preparation of this document. Writing of the RMP began in the winter of 1983/84.

PUBLIC PARTICIPATION

A Federal Register notice was published on October 7, 1981, to announce that the KRA was going to prepare an RMP; eight responses were received. All eight were placed on the mailing list.

In April of 1982, the State Director's office mailed out letters regarding the status of the plan; 27 responses were received by the KRA. All 27 inquiries were answered with a letter, including a map identifying analysis units, a list of possible issues, and a summary sheet of the nine planning actions involved in the RMP.

A second mailing of 291 letters was sent on November 25, 1983. These letters informed the following groups of the proposed issues and the criteria to be used: resource area grazing permittees, industry, conservation groups, consultants, local, state and Federal governments, and other interested citizens. The letter also was an invitation to attend a public meeting on December 8, 1983, to discuss the issues and criteria.

The public meeting was held as scheduled with 15 individuals attending; ten from industry, two from the local historical society, two from the Federal government (one Park Service and one Forest Service), and one rancher. The issues and planning criteria were approved on January 23, 1984.

Other informal coordination with the public took place throughout the planning process by means of personal contacts, formal and informal meetings, telephone calls, etc.

The Notice of Availability for the draft EIS was published in the Federal Register on April 12, 1985. Similar notices were also published in several local newspapers. During the 90 day comment period, several additional notices were published in local newspapers. Releases were issued to local newspapers to solicit public comment.

Approximately 600 copies of the draft EIS were sent out for comment to the agencies and organizations listed below, as well as to other groups and individuals.

After the draft EIS was released, two public meetings were held. The first public meeting was held in Kemmerer on May 13, 1985 with 21 participants. The second was held in Evanston on May 14, 1985 with 15 participants.

Comment letters received prior to July 26, 1985, are found in Chapter VI, together with BLM's responses to each of the concerns raised.

CONSISTENCY

Coordination with other agencies was accomplished through continuous communications and cooperative efforts between the BLM and involved Federal, state and local agencies, and organizations.

The Wyoming Governor's Clearinghouse was supplied with copies of the draft and this final document for review to ensure consistency with the State's plans, policies, and programs. Letters were sent to all affected counties and municipalities requesting a copy of their land use plans to review for consistency. A meeting with the Lincoln County Planner was held on January 24, 1984. Letters were also sent to the County Commissioners of Lincoln, Uinta, and Sweetwater counties. The towns of Opal, Diamondville, and Kemmerer sent copies of their land use plans for the resource area to review for consistency.

CONSULTATION AND COORDINATION

The Rock Springs District Multiple Use Advisory Council and the district Grazing Advisory Board were consulted to determine their concerns regarding the RMP.

Plans for the Bridger-Teton and Wasatch-Cache National Forests and Fossil Butte National Monument have been reviewed and supervisors and superintendents have been consulted.

AGENCIES AND ORGANIZATIONS CONSULTED

The RMP team has consulted with numerous organizations during development of the RMP. These include the following:

Federal Agencies

Bureau of Indian Affairs
Bureau of Reclamation
National Park Service
Soil Conservation Service
U.S. Congressman Dick Cheney
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service
U.S. Forest Service
U.S. Geological Survey
U.S. Senators Alan Simpson and Malcolm Wallop

State of Wyoming

Game and Fish Department
Geological Survey of Wyoming
Governor of Wyoming
Lincoln County Representative Alan Stauffer
Oil and Gas Conservation Commission
Public Service Commission
State Highway Department
State Land Use Planning Chairman
State Planning Coordinator
State Planning Engineer
University of Wyoming - Weather Department
Western Wyoming College
Wyoming Land Office
Wyoming Recreation Commission

Other State Governments

Governor of Idaho
Governor of Utah

Local Government

County Commissioners of Lincoln, Uinta, Sweetwater counties
Towns of Evanston, Kemmerer, Frontier, Opal, Fort Bridger, Granger, Lyman, Mountain View
Lincoln County Planning Office
Mayors of Cokeville, Kemmerer
Uinta County Planner
County Libraries of Lincoln and Uinta
Diamondville Town Planner

Industry

Amoco Production Company
Ark Land Company
Atlantic Richfield Company
Bronco Exploration
Champlin Petroleum Company
Chevron U.S.A.
Coastal State Energy Company
Conoco
Consolidation Coal Company
Consolidated Georex Geophysics
Daniel Geophysical, Inc.
Delta Aerial Surveys, Inc.
Enertec Geophysical Services Ltd.
Exxon
Fortune Oil Company
Geophysical Service Inc.
Grant Geophysical
HR Exploration Company
Idaho Power Company
International Association of Geophysical Contractors
JACOBS Engineering Group, Inc.
Kiewit Mining and Engineering Company
Marathon Oil Company
Meridian Land and Mineral Company
Morrison-Knudsen Company, Inc.
North American Coal Corporation
Northern Geophysical of America
Northwest Pipeline Corporation
Northwestern Resources Company
Overthrust Industrial Association
P & M Coal Company
Peabody Development Company
Petroleum Association of Wyoming
Petroleum Institute
Petty Ray Geophysical Division
Phillips 66
Rocky Mountain Energy
Rocky Mountain Geophysical
Rocky Mountain Oil and Gas Association, Inc.
Santa Fe Industries, Inc.
Shell Oil
Sohio Petroleum Company
Standard Oil Company
True Oil Company
Uinta Development Company
United States Steel Corporation
Upland Industries Corporation
Utah International Inc.
Utah Power and Light Company
Western Energy Company
Wexpro Company

CONSULTATION AND COORDINATION

Consultants

Antaeus: Resources Consulting
Attorney Edward M. Bown
Attorneys Lonabaugh and Riggs
BRW, Inc.
Center for Urban Affairs and Policy Research (Northwestern University)
Dames and Moore
Leedshill Consulting Engineers
Dick Loper
MSM Consultants Inc.
Willard Owens Associates
Wyoming Natural Heritage Program

Conservation Groups

Defenders of Wildlife
Natural Resources Defense Council
The Nature Conservancy
Overthrust Wildlife Association
Sierra Club
Sweetwater Wildlife Association
The Wilderness Society

Others

Many individuals were contacted including all range permittees and lessees in the KRA.

CHAPTER VI

COMMENTS AND RESPONSES

This section is divided into three parts: (1) comment letters and responses; (2) comments summarized from the two public meetings; and (3) errata.

The responses to comments fall into three general categories. Some comments required a clarification of the information in the draft EIS. These are found in response to the individual comment (either comment in a letter or public meeting comment). Other responses required minor changes in the text of the draft EIS. These changes are found in the Errata. Still other changes resulted in minor changes in the Proposed Plan. These changes are found under the Proposed Plan in Chapter II of this final EIS.

COMMENT LETTERS

Comment letters were received from 39 individuals and organizations. Each letter was assigned a reference number (1-39) for use in responding to comments (Table 6-1). Each letter was divided into its major points and each point was assigned a number. Each comment will be referenced by a two number code. The first number refers to the letter; the second number refers to the point within the letter (e.g., 37-13).

TABLE 6-1

COMMENTS RECEIVED

Assigned Number (in order of receipt)	Name of Commenter
1	Pacific Power and Light Co.
2	Conoco
3	Marathon Oil Company
4	Bureau of Reclamation
5	Oregon-California Trails Association
6	The Nature Conservancy
7	U.S. Nuclear Regulatory Commission
8	Lincoln County Historical Society
9	Chevron U.S.A., Inc.
10	Wyoming Wildlife Federation
11	Kiewit Mining & Engineering Co.
12	Green River Livestock Co.
13	Arco Exploration Company
14	U.S. Office of Surface Mining
15	Rocky Mountain Oil & Gas Association
16	Petroleum Association of Wyoming
17	CGG Land Seismic
18	Jamie Schoen
19	Sweetwater County Wildlife Association
20	Defenders of Wildlife
21	Wyoming Office of the Governor
22	Wyoming Dept. of Economic Planning & Development
23	Wyoming SHPO
24	Wyoming Recreation Commission
25	Wyoming State Engineer's Office
26	Wyoming Oil and Gas Conservation Commission
27	Wyoming Dept. of Environmental Quality
28	Wyoming Geological Survey
29	Wyoming Recreation Commission
30	Wyoming Public Service Commission
31	Wyoming Game and Fish Department
32	Wasatch Nat'l Forest, Mountain View Ranger Dist.
33	Wasatch Nat'l Forest, Evanston Ranger District
34	Lincoln Conservation District
35	U.S. Fish and Wildlife Service
36	Amoco Production Company
37	U.S. Environmental Protection Agency
38	National Park Service
39	U.S. Air Force

1

PACIFIC POWER & LIGHT COMPANY
WYOMING DIVISION
BOX 720
CASPER, WYOMING
82602

ADMINISTRATIVE OFFICES
TELEPHONE 307 235-0420

May 3, 1985

ENGINEERING DEPT.
TELEPHONE 307 235-0420

Mr. Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P. O. Box 1869
Rock Springs, Wyoming 82902-1869

Subject: Draft - Resource Management Plan/EIS for Kemmerer Resource Area

Dear Mr. Stein:

In regard to your request for comments on the above Plan, please
1 include additional utility corridors as shown marked with black tape on the enclosed Map A. The main east-west 230 kv line belonging to Pacific Power has been in place since 1964 and extends from Pacific's Rock Springs Substation in Sweetwater County to the Utah Power & Light Company, Naughton Generating Plant in Lincoln County. The 230 kv tap extending north from that line will provide service to Exxon's Shute Creek project in Lincoln and Sweetwater counties and is presently under construction. The 230 kv line extending west between Little America and Westvaco is the main source for service to Tenneco, Allied Chemical, Little America, and several other customers and has been in place since 1980.

Pacific and Idaho Power have three 345 kv lines which occupy an existing corridor already included on Map A. If you have any questions, please give me a call.

Very truly yours,

William R. Marsh
Manager, Electrical Engineering
Wyoming Region

WRM/ac

Enc.

Response 1-1: We have corrected our base maps to show the existence of the power line addressed in your comment.

2

conoco

Mark K. Mosley
Division Manager
Production Department

Conoco Inc
907 North Poplar
Casper, WY 82601
(307) 234-7311

May 29, 1985

Mr. Alan Stein, Team Leader
Rock Springs District Office
P. O. Box 1869
Rock Springs, WY 82902-1869

Dear Mr. Stein:

Kemmerer Resource Management Plan (RMP)
Draft Environmental Impact Statement (DEIS)
Comments
File: DM-933-CF

Conoco Inc., North American Production, appreciates the opportunity to comment on the subject RMP and DEIS. As operators of oil and gas exploration and production operations in Wyoming, we are keenly interested in the development of management plans which will affect our business.

1 Conoco Inc. supports multiple use of our natural resources. Alternative E in the subject document is stated as being the management alternative designed to support such multiple use concepts. However, careful review of the issues demonstrates that most of the management decisions rely on the conservative directives given under Alternative C, the wildlife alternative. Restrictions on oil and gas activities under Alternative E are quite severe. "No surface disturbance" and "no surface occupancy" stipulations should be decided on a case-by-case basis, and not established a priori as in the RMP. Conditions may arise where drilling is necessary in certain areas such as near a perennial stream or on relatively steep slopes. If the operator can demonstrate such activity can be conducted without significant threat to the environment, there should be a mechanism within the regulations to allow him to do so. The restrictions put forth in Alternative E serve to repress multiple use of natural resources, not enhance it.

2 The oil and gas industry has operated in high H_2S areas for many years, and sufficient regulations exist to ensure that such activities are conducted in a safe manner. We are concerned with the on-site monitoring of weather conditions, open flow calculations, and real time dispersion modeling, all of which "may be required" in certain areas. Situations such as drilling in areas of known high H_2S concentrations may warrant such actions. However, there are ample provisions in existing regulations to stipulate such requirements, if necessary. We are concerned that once modeling and monitoring requirements are established in the RMP, they will be imposed indiscriminately. Again, a case-by-case analysis appears adequate.

Response 2-1: The stipulations were developed through extensive experience with oil and gas development throughout the resource area. Sufficient flexibility has been provided to allow exceptions on a case-by-case basis.

Response 2-2: A case-by-case analysis of wells proposed in H_2S areas is a normal procedure to determine the necessity and magnitude of contingency plans. The final RMP reflects that a contingency plan is required and gives several examples of items that may be required in the contingency plan.

Response 2-3: We have modified the offsite mitigation provision to more clearly define our proposal. A certain degree of flexibility is necessary to ensure that such requirements are applied to meet certain objectives and are not applied for their own sake. Offsite mitigation would be considered for larger disturbances in crucial winter ranges and sensitive wildlife areas. It would generally not be imposed for exploratory wells. The "10 percent threshold" and "effective habitat" concepts have been removed from the Proposed Plan.

2

Mr. Alan Stein, Team Leader
Rock Springs District Office
May 29, 1985
Page Two

3 Alternative E discussed the possible imposition of "off-site mitigation" in certain areas where oil and gas facilities have resulted in wildlife habitat being "taken out of production". No specific information on what criteria will be used to make such decisions is given. Oil and gas production operations do not reduce actual habitat significantly. Oil fields throughout the west can be shown to harbor healthy populations of large and small game species, as well as non-game varieties. In extreme cases where large industrial plant sitings are involved, some form of mitigation may be warranted. However, under normal oil and gas production operations, this "forced" habitat enhancement is unnecessary. Operators are already required to fully reclaim all disturbed areas. It would be helpful to elaborate on this issue of off-site mitigation further in the RMP.

Again, we appreciate the opportunity to comment, and hope that our input will be considered in the development of the final RMP for the Kemmerer resource area.

Very truly yours,

Mark K. Mosley
Division Manager

pah

3

Casper Division
Production United States

Marathon Oil Company

P.O. Box 120
Casper, Wyoming 82602
Telephone 307-235-2511

June 3, 1985

Mr. Alan Stein
Team Leader
Rock Springs District Office
Bureau of Land Management
Post Office Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein:

RE: COMMENTS ON KEMMERER
RESOURCE MANAGEMENT PLAN

1 The Resource Management plan is a relatively concise document outlining how the resources in the area are going to be dealt with. The problem with the coverage of minerals, and more specifically oil and gas, is that there was no apparent attempt to incorporate the fluid mineral leasing guidelines. These guidelines and the associated analysis should be incorporated to provide a comprehensive discussion of the tradeoffs among resources when making those resource allocations.

2 The plan talks at length about the impacts from geophysical activities yet does not discuss the short term nature of these impacts. The disturbances from seismic activities are short term in nature and occupy very little surface habitat. The constructed time frame for seismic activity is a factor which has greatly magnified those impacts. When companies have very restricted shooting windows, a lot of activity has to happen if programs are going to be completed in the allotted time.

3 The discussion of off-site mitigating measures mentioned under Issue 5, Page 87, are untenable. A seismic line or exploratory well which is temporary in nature and limited in disturbance should not be required to fund off-site mitigating measures. Once production is established and

Response 3-1: The fluid mineral leasing guidelines were in draft form when the draft EIS was published. They are still in draft form. Some data on oil and gas potential are not available to BLM. Because of the complex geology of the Kemmerer Resource Area (KRA) and the presence of known oil and gas resources, we have assumed that the entire resource area has potential to be developed for oil and gas (page 100 of the draft EIS). We have identified the entire resource area, except for Raymond Mountain, as open to leasing and have identified restrictions in certain areas.

Response 3-2: Some impacts from geophysical operations are short-term; however, other impacts (e.g., erosion) can be long-term. The restrictions placed on geophysical operations are directed at reducing the potential long-term impacts and at protecting wildlife during critical periods.

Response 3-3: See Response 2-3.

Response 3-4: The Erosion Control, Revegetation, and Restoration Plan (ERRP) presented in Appendix C is an example of key reclamation topics to be covered. The format is an applicant's option; however, the content should reflect the points in Appendix C. A surface use plan is required for all proposed well sites. From the exploratory phases through the development stages of the well, it is anticipated that modifications will occur.

3

Mr. Alan Stein
June 5, 1985
Page No. 2

development is planned, a cooperative agreement could be entered into by the agencies and the other parties. This point is brought out by reviewing the critical winter ranges displayed on Map 8 which shows very large critical winter ranges, yet there is no documentation as to herd unit boundaries, size, or distribution. In the event of a dry hole, the oil industry would be paying not only for well site reclamation and rehabilitation, but would also be developing or creating an equal area of improved additional critical habitat. We urge your incorporation of the "Guidelines for Mitigation of Wildlife Impacts" by the Overthrust Industrial Association.

4 Under the soils reclamation area Issue 3, page 85, it is stated that the format and content of Appendix C would be an optional format for point 10 of the surface use plan. Whose option is this? This seems more geared toward the development stage and not the exploratory well stage. Clarification as to this optional implementation is needed.

5 Under the requirements for H_2S contingency plans and air modeling for the preferred alternative, the cost of data collection, reduction, and modeling are prohibitive for exploratory wells. More cost effective measures of prevention, such as vapor recovery units and treating equipment, would be more practical and solve the problem not just determine the problem. This section should be revised to incorporate design specifications to meet pollution standards and not monitor these pollutants.

6 Appendix B-1 is subtitled "Standard Stipulations for Oil and Gas Leases". These stipulations are not standard but are special stipulations applicable in specific instances. Where there are areas of sensitive environment, they should be applied. Where there are standard situations, the standard constraints should apply, not special stipulations for standard situations. If none of the blanks are going to be filled in, why attach the standard stipulation to the lease?

7 Under the discussion of oil and gas potential you base the whole resource area potential from the comments from two companies. If these are all the evaluations you received, state so. If not, please include a detailed map of the mineral potential ratings for the resource area.

3

Mr. Alan Stein
June 5, 1985
Page No. 3

8 It is stated that the other resource areas of the BLM and the Forest Service adjacent to the planning area were consulted in regard to their plans, in relation to yours. It is apparent from talking with the Pinedale Resource area and the Bridger-Teton Forest that you did not pay any attention to their comments. These areas have approached oil and gas in a different way than you.

Thank you for the opportunity to make these comments and we urge their consideration and incorporation.

Sincerely,

Bradley G. Penn

Bradley G. Penn
Land/Environmental
Coordinator

BGP:dg

Response 3-5: It is unlikely that there would be additional requirements, beyond what is normally submitted in an H_2S contingency plan for an exploratory well. The Proposed Plan indicates that a contingency plan will be required and gives examples of what may be required in the contingency plan.

Response 3-6: The stipulations for oil and gas leases in the draft EIS (Appendix B-1) are special stipulations, not standard stipulations to be applied to all leases. The Wyoming BLM recently revised the stipulations and reduced the number to four, with Number 1 applicable to all leases. See Appendix B-1 of the final EIS for the revised State Office approved stipulations.

Response 3-7: See comment 3-1. The coverage of the area by geophysical lines and the presence of wildcat drilling activity supports the view that the KRA has potential to be developed for oil and gas. Only two companies provided ratings of the resource area. All areas in the KRA were rated by the companies as having high favorability for oil and gas development. Although hydrocarbons have not been found in commercial quantities in parts of the KRA, the geologic environment indicates a good potential for discoveries. Based on the history of the Evanston area, which had a prolonged period of dry holes prior to major discoveries, we cannot assume a "low potential" for areas that have not yet yielded discoveries.

Response 3-8: We have consulted with both the Bridger-Teton National Forest and the BLM's Pinedale Resource Area. We have been able to identify no substantive differences in our approaches to oil and gas.

4

United States Department of the Interior

BUREAU OF RECLAMATION
UPPER COLORADO REGIONAL OFFICE
P.O. BOX 11568
SALT LAKE CITY, UTAH 84147

IN REPLY REFER TO: UC-150
130.1

JUN 1 1985

Memorandum

To: Mr. Alan Stein, Team Leader, Rock Springs District Office, Bureau of Land Management, P.O. Box 1869, Rock Springs, Wyoming 82902-1869

From: Regional Director
Bureau of Reclamation

Subject: Kemmerer Resources Management Plan - Draft Environmental Impact Statement (BLM DES 85-19)

The Bureau of Reclamation has reviewed the subject document. The Bureau of Land Management has obviously conducted an in-depth analysis of multiple concepts in a commendable manner. The document responds well to stated issues and concerns. The preferred plan, Plan E, shows a rational and sensitive approach to meet the diverse needs of the resource area. The special interests of the Bureau of Reclamation are either unaffected by or are in harmony with the preferred plan. The most notable concern that Reclamation has with the resource area is control of the watershed to enhance water quality and minimize salinity contributions to the Bear and Green Rivers. The preferred plan appears to be responsive to that concern and thus would be in harmony with the Colorado River Salinity Control Act. Plan A, as described, would not be in harmony with the act, and Reclamation would have strong reservations should it be adopted. General comments on the document are as follows:

1 1. It is difficult to decipher which plan is the preferred plan. The only identification is an obscure sentence near the end of the Summary and on Page 83. It is also difficult to maintain a focus for what each alternative represents while reading the several alternative segments within the text. A suggestion to resolve this problem would be to place an abstracted title within parentheses alongside each alternative designation, e.g. Alternative A (Reduce Oil and Gas Restrictions), Alternative B (Emphasis on Livestock Grazing), Alternative C (Emphasis on Wildlife and Watershed), Alternative D (No Grazing), Alternative E (BLM Preferred Plan). Such designations, if adopted, should appear in the table of contents, the summary including Table S-2, the headings under Chapters 2 and 4, and Table 2-1.

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2 2. Under "Planning Actions" and "Planning Issues" on Pages 1 and 2, reference is made to the involvement of the public to help identify "problems and conflicts," "concerns and unresolved questions." However, there is no discussion of how the public was involved or how the public input was used to arrive at the issues noted in the next subheading. Such a discussion would add to the credibility of the document and strengthen the management decisions.

3 3. Under "Planning Issues," last paragraph, Page 2. Reference is made to concerns that "may not be apparent in the planning issues." The questions is raised as to how these nonapparent concerns were handled.

4 4. Page 112, Surface Water, penultimate and last paragraphs. Reference is made to 376,000 tons of salt leaving the KRA via the Bear and Green Rivers annually. Reference is also made to phosphorous loadings attributable to the KRA being responsible for part of the eutrophication in Flaming Gorge Reservoir and Bear Lake. Although these admissions are made, there is no discussion in the document of either studies, decisions, or proposals for lessening this impact. Nor is there any reference to coordination with areawide wastewater management agencies (Section 208 of the Clean Water Act) to implement or develop watershed water quality controls.

5 5. Page 170, last paragraph. Here and elsewhere it is stated that damage may occur to groundwater as a result of drilling and wastewater injection. No reference is made as to existing or potential controls that could minimize or prevent this degradation from happening. Most states have laws governing the injection of wastes underground. Reference should be made to such laws or other controls as they exist in Wyoming.

Thank you for the opportunity to review the Kemmerer Resource Management Plan and DEIS. We look forward to a continued coordinated relationship regarding those resources in which our agencies share a mutual interest.

Response 4-1: Our reason for not giving each alternative a descriptive name was to not bias the reader's opinion of the alternatives by giving them biased titles. The general thrust of each alternative is described in the Summary of the draft EIS as well as under each alternative in Chapter 2.

Response 4-2: The public were involved in the development of the issues. This involvement was summarized on page 207 of the draft EIS (Consultation and Coordination).

Response 4-3: This statement was intended to inform the reader that not every concern can be resolved by a decision made in an RMP. Some concerns can only be addressed at a different level or tier of decision (e.g., a site specific project or a change in legislation).

Response 4-4: The BLM is a member of the Flaming Gorge and Upper Colorado River Salinity Control Group. We are trying to reduce phosphorus and salinity loads by requiring best management practices for surface-disturbing activities and by preparing allotment management plans (AMPs) for grazing allotments with riparian problems which have the potential to be improved. The percentage of reduction in phosphorus and salinity that may occur is not known and, for the resource area, depends on many factors.

Response 4-5: Because of the absence of a detailed groundwater inventory and map, our ability to develop specific land use decisions to protect groundwater is limited. Our actions focus on reviews of individual actions (e.g., injection wells). For injection wells, we apply the Wyoming Department of Environmental Quality stipulations. The quality of the wastewater to be injected and the injection zone are examined for each proposal.

5

OREGON-CALIFORNIA TRAILS ASSOCIATION

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June 29, 1985

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Russell E. Dickenson, Director
National Park Service
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Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P.O. Box 1869
Rock Springs, Wyo. 82902-1869

Dear Mr. Stein,

In reveiwing the Kemmerer Resource Management Plan EIS, OCTA would like to recommend Alternative E, with the exception of a sale of land in Sec. 25, T. 14N, R 121W, near Evanston.

1 This parcel of land contains a landmark on the Mormon Trail known as "The Needles", and we feel that this landmark should be protected by the Federal Government as a significant historical site.

2 We also recommend the enforcement of a one-half mile buffer zone along the trail corridor, crossings of the trail at 90 degree angles, and no parallelling newly constructed roads, pipelines or transmission lines, and any crossings of the trail to be done so at points of previously disturbed and destroyed sites.

We look forward to working with you on issues concerning the trails through the Kemmerer Resource District as well as other districts within the Rock Springs District.

Sincerely,

Karen Buck

Karen Buck,
OCTA Director

Response 5-1: We concur, and accept the recommendation. We also note that all lands proposed for transfer into private ownership would be subject to on-site inspection and cultural resource inventory, if necessary. If significant sites are located, the sites would be mitigated or, more regularly, the land would not be not sold.

Response 5-2: Your recommendation represents a summary of our current historic trails management guidelines.in place and operational. No changes to these basic guidelines are proposed or anticipated.

6

The Nature Conservancy

Tom Wolf
Protection Planner
719 Brookhaven Court, Suite D
Fort Collins, Colorado 80525
(303) 493-1407

June 28, 1985

Alan Stein, Team Leader
Rock Springs District
Bureau of Land Management
P.O. Box 1869
Rock Springs, WY 82902-1869

Dear Mr. Stein:

These are The Nature Conservancy's comments on the draft EIS of the Kemmerer Resource Management Plan. They are based on the work of the Wyoming Natural Heritage Program's scientists, who have been conducting a comprehensive survey of Wyoming's flora and fauna since 1979. Thorough literature searches, followed by consultation with all knowledgeable experts, and then field checking, site by site, allow the Heritage Program to provide authoritative information for land managers and planners to use in the wise management and conservation of Wyoming's unique natural heritage.

In general, we accept your management recommendations for our two sites of concern, and we agree that Alternative E provides the most reasonable way to protect these sites. We commend you for the accuracy of your maps, and we accept the analysis of the management situation presented on p. 116.

1 It is not entirely clear to us, however, that the "No Surface Occupancy Stipulations" apply to both sites. We think that NSOS is just as applicable to the Physaria dornii sites as it is to the cushion plant sites.

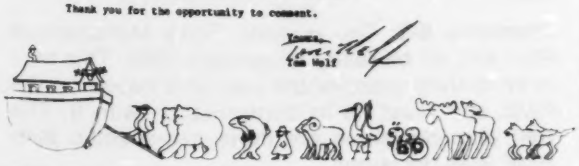
2 Further, we would like to see directions that the sheep trail which passes through the Physaria dornii sites may continue in use as long as the sheep are not bedded on the sites.

3 We have the same concerns for more detailed management direction at the cushion plant site, where livestock grazing could continue as long as sheep bedding does not occur. We would also like to see provisions for annual checks of each site. We would be glad to cooperate in any way possible with the allotment holders listed in Appendix A-9. We feel that an appropriate place for the above specific management suggestions regarding livestock might be in Appendix A-6, Range Management Opportunities.

Thank you for the opportunity to comment.

Yours,
Tom Wolf

Tom Wolf



Response 6-1: "No surface occupancy" stipulations apply to *Physaria dornii* (see Proposed Plan).

Response 6-2: Due to the steepness of these sites, it is unlikely that sheep would be bedded on them.

Response 6-3: Sheep bedding sites are highly variable from year to year and rarely occur in exactly the same place. This variability minimizes the effect on plant communities. We agree that an annual inspection of these sites would be beneficial and would be happy to coordinate the meeting.

7

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 2 1985

Mr. Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P. O. Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein:

In response to the letter dated March 1985, from Mr. Hillary Oden to the Nuclear Regulatory Commission, we have reviewed the Draft Environmental Impact Statement (EIS) prepared by the U.S. Department of Interior for the Kemmerer Resource Management Plan. Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed facilities. No potential effects were identified; therefore, we have no specific comments on the draft EIS.

Thank you for the opportunity to review the draft document.

Sincerely,

James P. Knight, Acting Director
Division of Engineering
Office of Nuclear Reactor Regulation

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Ralph Thayer, President
Myrle Hanson, Vice-President
Paul Guraedy, Secretary-Treasurer

P. O. Box 465
Diamondville, Wyoming 83116

Lincoln County
Historical Society

July 2, 1985

Ron Wenker
Area Manager
Kemmerer Resource Area
Bureau of Land Management
P.O. Box 632
Kemmerer, Wyoming 83101

Dear Mr. Wenker:

The Lincoln County Historical Society appreciates the opportunity you extended for commenting on the Draft Environmental Impact Statement of the Resource Management Plan. Specifically, we are most interested in Cultural Resources on page 40 - 41, and have the following comments/questions.

1 1. In the first paragraph the qualifier "most" is used in connection with surface disturbances. Who will be the arbiter of when an inventory will/will not be required. We believe that examples or specific cases of "non-inventory" should be cited in the plan.

2 2. We have the same comments (stated in #1) for the last sentence of paragraph 1 under Historic Trails on page 41. In this sentence the qualifier "generally" is used.

3 3. In the final sentence of the section on Historic Trails, reference is made to the Historic Trail Management Plan. When will this plan be completed? We suggest that it and/or the "Bureau's current historic trail management goals" be included as an addendum to the Resource Management Plan.

Sincerely,

Ralph Thayer

cc: David Kathka, WHS

Response 8-1: Surface-disturbing activities not requiring Class III cultural resource inventory are outlined in Wyoming State Office Instruction Memorandum No. WY-85-404. Four conditions generally preclude the need for Class III (100% coverage) inventory: 1) prior disturbance of the ground, 2) adequate prior survey indicating a low to nil likelihood for past use, 3) earlier survey of the area, e.g., "clearing" a well pad in an area that had previously been surveyed for a coal mine, and 4) the existence of natural conditions that preclude the location or preservation of cultural sites, e.g. rockfalls, mudslides, or recent floodplains associated with meandering water-courses.

Response 8-2: Generally, disturbance is not permitted for ¼-mile on either side of intact trail remains. If conditions, such as the presence of a hill or ridge, are such that a disturbance will not be visible from the trail, the "buffer" may be reduced. Other factors, such as the condition of the trail or the lack of alternative routes for the disturbance, are considered on a case-by-case basis.

Response 8-3: The Historic Trails Management Plan should be ready in January 1985. This plan is an activity plan for the trail. It is based on the RMP and must be in conformance with it. The trail plan decisions are more site-specific than RMP level decisions.

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Chevron U.S.A. Inc.
700 South Colorado Blvd., P. O. Box 599, Denver, CO 80201

July 3, 1985

Kemmerer Draft RMP/EIS

Mr. Alan Stein
Bureau of Land Management
P. O. Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein:

Thank you for the opportunity to review and comment on the captioned document. As an oil and gas operator, we are encouraged to see that your Plan recognizes the importance of the oil and gas resource in an area which is among the most productive and prospective in the United States.

It appears that the management under the proposed Plan will be somewhat more restrictive on oil and gas activities than existing management. Nonetheless, we believe all of our current activities in the Resource Area can be accommodated under the proposed management. Still, we reserve the right to challenge future decisions on our future activities should they not be justified under the circumstances at that time.

Sincerely,

Richard T. Hughes

RTH:lic

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Wyoming Wildlife Federation
P.O. Box 106
Cheyenne, WY 82003

July 8, 1985

TO: Alan Stein, Team Leader
Bureau of Land Management, Rock Springs Offic

FROM: Wyoming Wildlife Federation

RE: BLM Kemmerer Resource Management Plan (EIS)

COPIES TO: Forrest Hammond, Wyoming Game and Fish
Elaine Raper, Wyoming Game and Fish
John Borzea, Wyoming Wildlife Federation
Chris Peterson, Wyoming Wildlife Federation
Craig Kesselheim, Wyoming Wildlife Federation

Please accept the following comments of behalf of Wyoming Wildlife Federation, a private citizens group with over 8,000 members from all professions. References in this document to "the Federation," or "we" or "WWF," are intended to mean Wyoming Wildlife Federation.

WWF is an organization with deep roots in Wyoming. Our members are united in the cause of wise use of our State's natural resources, and the comments that follow stem from this basic philosophy.

Our comments are somewhat limited regarding management alternatives A, B and D, since alternatives C and E are the "wildlife" and "preferred" alternatives, respectively. It is the opinion of the Federation that alternatives C and E possess the best potential for multiple resource use and minimal temporary and permanent impacts. Additionally, we believe these alternatives to be most consistent with the BLM planning criteria that are outlined beginning on p. 7 of the EIS.

We look forward to receiving your responses to the comments that follow. Please add the following Federation directors' addresses as people who should receive copies of your response, as well:

Craig Kesselheim
601 Sage St.
Evanston, WY 82930

John Borzea, Jr.
2235 E. Teton Blvd.
Green River, WY 82935

Chris Peterson
3519 Partridge Lane
Casper, WY 82604

continued ...

Response 10-1: The wording in many of the restrictions was developed to show the objective of the restriction and still provide discretion for the responsible official. If the objective of a stipulation can be met in a less restrictive way, the responsible official would have the authority to allow a modification.

Response 10-2: The application of a "no surface disturbance" stipulation will be considered for sensitive species habitat on a case-by-case basis. The Proposed Plan prohibits surface disturbance during the nesting season for sensitive raptor species in the area. A recent statewide standardization of oil and gas leasing guidelines allows seasonal restrictions to apply to all raptor species (Appendix B-1). Whooping crane and black-footed ferret habitat fall under the more stringent requirements of the Endangered Species Act.

Response 10-3: The enforcement of BLM stipulations by periodic field checks is the most cost-effective method of enforcement available under most circumstances. Complete surveillance of a project is rarely required. Enforcement of the stipulation for sage grouse would not be unusually difficult since it is likely that only one or two sage grouse leks would be affected per year.

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BLM, cont. -2-

General Comments:

1 1. In numerous places throughout the RMP, BLM has elected to use "loophole wording" where firm, unambiguous phrases would be more definitive and better enforced. Many of these places will be mentioned in the comments that follow. We recommend that each alternative be a firm, clear management tool that possesses teeth and enforcement potential. BLM would approach this goal by substituting "will be" for "could be," for example, when listing stipulations.

2 2. BLM should consider No Surface Occupancy (NSO) stipulations for all species deemed sensitive to disturbance, or whose status is unknown, or whose presence can be expected in future years. Some of these species are Whooping Crane, Goshawk, Cooper's Hawk, Merlin, Peregrine Falcon, Burrowing Owl and Black-footed Ferret. Some of these species would require very particular protective stipulations. For example, Whooping Crane mortality is often caused by either powerlines or fences.

3 3. Some stipulations in the document (e.g., Sage Grouse lek activities allowed between certain hours only, during the strutting season) can only be enforced through periodic field checks by BLM staff. The Federation seriously doubts the ability of BLM to provide such man-hours in the field; likewise, we doubt the willingness of some operators to comply with these stipulations without supervision or at least the threat of same. In general, BLM guidelines should not leave room for violations as the example mentioned seems to.

4 4. Since BLM generally considers lease re-offerings, Applications for Permit to Drill (APD's) and other activities on a case by case basis, there appears to be no inventory/review process that addresses the cumulative impact of such activities on wildlife, grazing, recreational and aesthetic resources. Cumulative impact should be at the crux of BLM's consideration of each new activity. The Federation recommends this broader philosophy, as it allows for multiple use of the KRA while implementing a "whole picture" management style.

continued ...

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BLM, cont. -3-

Specific Comments

5 1. Summary pp., under Issue 4: Substitute "are" for "may be." If 50% or more of the range in the Kemmerer RA is listed in "I" (Improve) status, this implies that changes in range management practices are certaily in need of change.

6 2. Table S-1, Recreation para. 2: Substitute "will" for "may."

7 3. p. 6, Issue 3, para. 2: Only the forage needs for livestock are recognized as important in reclamation efforts. Native species and wildlife needs should be an acknowledged priority, as well.

This section should also explain that some abandoned sites within the KRA have not been reclaimed at all.

4. p. 6, Issue 6, para. 1: The Federation concurs with BLM that "preservation of the potential for (recreation) development is a major recreation issue." We support BLM efforts to preserve recreation potential for the areas listed here, and wish to stress that income provided by recreation, hunting and other outdoor pursuits is a mainstay in Wyoming's economy. It would not be out of line with Wyoming's unique resources and recreational stature if BLM were to provide funding for development of recreational sites. In the meantime, recreation potential should be maintained through preserving aesthetic values, supervision of road systems and ORV impacts.

5. p. 7, Issue 9, para. 2: The Federation supports BLM recognition of the need for road management, especially in crucial winter ranges.

6. p. 7, General Planning Criterion #4: Federation endorsement of Alternative C is based in part upon this criterion. The "wildlife" alternative allows for multiple use while maintaining, not diminishing, Wyoming's wildlife resourses. Since wildlife and other outdoor resources provide Wyoming's second largest source of income, this element should receive its due consideration.

8 7. p. 8, General Criterion # 14: This criterion seems to be contradicted in (preferred) Alternative E, p. 86, where, in the last sentence it is stated: "Reestablishment of riparian vegetation would often be a key objective." Should

continued ...

Response 10-4: The draft EIS (page 11) states that virtually the entire resource area is leased for oil and gas. Because of this and because of the checkerboard land pattern in most of the resource area, "No Leasing" would not resolve the issue in the KRA. Alternative C includes a proposal to withdraw the most important parts of big game winter ranges from leasing.

If "no surface occupancy" stipulations were placed on crucial winter ranges in the checkerboard, they would not have the desired effect because of the private land interspersed among the public land. If "no surface occupancy" stipulations are used in areas where there is a large percentage of public land (e.g., in crucial winter ranges), they would effectively withdraw the areas from leasing. "No surface occupancy" stipulations have been proposed on threatened, endangered, and sensitive plant sites, within ¾ mile of raptor nest sites during certain periods, on slopes in excess of 40 percent, and in wet or sub-irrigated areas.

Response 10-5: This change has been made.

Response 10-6: The impacts of access for logging operations depend on a site-specific analysis of the impacted natural area and the disturbance.

Response 10-7: Wildlife needs are taken into account. For example, the draft EIS (page 85) states that the plant species for Alternative E "would be determined by location and may favor either wildlife, watershed, or livestock."

Response 10-8: The sentence has been changed as suggested.

Response 10-9: The wording has been changed to address your concerns, where appropriate.

Response 10-10: See Response 10-4.

Response 10-11: See Response 10-4.

Response 10-12: In formulating reclamation goals and methods, the tendency is to be specific. When dealing with variables such as moisture, adverse weather, access, and equipment problems, flexibility is needed in reclamation management decisions. Anticipated time frames and methods should be flexible to take advantage of favorable conditions for optimum reclamation success.

Response 10-13: We could not agree more that indiscriminate fencing could have an adverse impact on wildlife. However, the intelligent use of fencing as a management tool is a cost-effective option in designing grazing systems. These systems benefit the vegetation by allowing periods of rest from grazing at different stages in a plant's phenology. The beneficial effects of this rest are well documented. The policy of the KRA is to design grazing systems with the minimum amount of fence. All fences will be designed to control livestock and still provide for movement of wildlife.

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BLM, cont. -4-

the word be "always," if riparian habitat is to be maintained in "current condition or better?"

8. p. 8, Wildlife Habitat Management: The Federation supports BLM in its efforts to coordinate their management practices with Wyoming Game and Fish Dept., and the US Fish and Wildlife Service.

9 9. p. 8, Wildlife Habitat Management, #4: The repetitive use of the term "identify" is confusing. How may we interpret this in terms of action taken? Would a better term be "enforce?" Or, BLM may desire to "identify, then enforce" the programs mentioned.

10 10. p. 11, No Oil and Gas Leasing: since leases do expire, new leases could be denied in areas of critical wildlife concerns (leks, calving grounds, raptor ranges). Hence, a decision not to lease is not blanket-like for the entire KRA, but is rather case-by-case. Not leasing should be considered a viable management alternative.

11 11. p. 11, Alternative 2: We wish to point out that NSO status is essential to reducing stress in crucial big game winter ranges. In severe winters, minor habitat loss and unintentional harassment spells death for many game animals of their range. Crucial winter ranges have been identified for this reason! BLM must consider the cumulative impacts of such a permissive position as this. The Federation recommends that the BLM coordinate with Wyoming Game & Fish on this issue and implement their advice.

12 12. p. 33, Reclamation: The Federation supports BLM reclamation goals. We wonder (para. 2) about pads that are unreclaimed and abandoned. BLM policy needs teeth here, and we don't find them in writing. "As soon as possible" is too vague regarding the reclamation timeline. Why does this vague wording exist?

The Federation feels that, once erosion is checked, reclamation species should approximate the native cover as closely as is feasible.

13 13. p. 34 - 35, Fish and Wildlife Habitat: We support the implementation of wildlife-passage fencing. The Federation does not approve of woven wire

continued ...

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BLM, cont. -5-

fencing in areas where wildlife must pass.

We wonder if the BLM is allowing excessive fencing systems to be constructed on public land. This section of the management plan seems to make allowances for fenced systems of rest-rotation pastures, which could impact wildlife use of riparian areas. Conversely, of course, no fencing means potential loss of the riparian habitat altogether. We simply ask that BLM be aware of this double-edged sword, and that fencing is implemented to protect the habitat and to allow wildlife access.

If the KRA's riparian areas are mostly in decadent condition (pp. 120-121), BLM should be initiating more than just the one regeneration project on 200 acres of the Thomas Fork drainage. BLM has inventoried its riparian holdings - next it should restore them!

14 14. p. 37, Raymond Mountain WSA: Whether Raymond Mountain receives wilderness status or not, the Federation recommends only back-country use and no new roads for the area.

15 15. p. 40, Forestry Resources, col.1: A time frame of 15 years before planting of logged areas is ludicrous. If natural regeneration does not occur within 3 - 5 years, planting should take place. Otherwise, such habitats could be out of productive use for up to 30 years! We recommend you revise this wording.

16 16. p. 51, Oil and Gas dates: We think we detect a misprint in your elk calving areas dates. shouldn't they read "June 30 - May 15," so as to concur with dates you mention elsewhere?

17 17. p. 54, Fish and Wildlife Habitat, para. 3: We would recommend these items for the BLM Woodruff Narrows HMP:

a) That the HMP recognize a Bald Eagle forage range to include the entire stretch of Bear River between the WN dam and the eagle roosting area, as well as adjacent BLM holdings.

b) That the BLM impose stipulations on hydroelectric activities below the Narrows to include:

* limiting human presence at the plant to daylight (non-roosting) hours;
* establishing a ceiling on allowable individuals and/or vehicles at the plant at one given time;
* possibly a stream-flow minimum in Bear River (consult G & F) to

continued ...

Response 10-14: New roads are not planned for the Raymond Mountain WSA. If the WSA does not receive wilderness status and the area is leased for oil and gas again, exploratory wells in the WSA could promote the construction of new roads. Oil and gas is the only resource that is expected to impact the WSA with new roads.

Response 10-15: The Forestry section of the Proposed Plan has been reworded. We perform scheduled stocking surveys at specified intervals after logging. These surveys help determine if regeneration is occurring. We prefer natural regeneration to planting. If it is evident that regeneration is a problem we can plant seedlings any time after logging.

Response 10-16: The dates have been changed in the Proposed Plan.

Response 10-17: The detailed comments on Woodruff Narrows HMP are appreciated; however, they are at a site-specific level which is appropriate for the HMP.

Response 10-18: Alternative A provides for the most efficient use of the KRA for the production of oil and gas. To achieve this objective, there would be tradeoffs, as with all other alternatives. The intent was to meet the objective, to the extent it can be met, while meeting all other legal requirements.

Planning criteria are guidelines for developing the plan. Each element of the plan is not expected to meet all planning criteria in all cases. The planning criteria are resource area-wide constraints on alternatives.

Response 10-19: Geophysical exploration in crucial big game winter ranges would be restricted when the animals are under winter stress (November 15 to May 15) in the Proposed Plan, except on a case-by-case basis. The less restrictive dates only apply to those areas used by wintering big game every year. In these areas no exception would be granted.

The incomplete sentence on page 75 has been removed from the Proposed Plan to avoid ambiguity.

Response 10-20: The Proposed Plan has been modified to reflect your concerns and others (Geology and Minerals).

Response 10-21: The Proposed Plan (see Geophysical Exploration) shows a modified restriction for sage grouse. Reclamation standards for a disturbed lek site would generally be the same as for any other area. If the site is brought back to original contours with no obstructions, and similar vegetation structure, it should still be suitable to sage grouse.

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BLM, cont. -6-

maintain fish habitat, since Bald Eagles are known fish eaters.

18 18. Alternative A: The Federation has not considered this alternative seriously. It is our hope that Alternative A was developed as a theoretical plan only to satisfy the established guidelines for your EIS. The logging guidelines (or absence of) outlined on p. 66, Fish and Wildlife Habitat, are shocking and in direct conflict with planning criteria (pp. 7 - 8) #'s 2 (sensitive to local concerns), 3 (protecting fragile and unique resources), 4 (economic stability and diversity), 7 (multiple use and sustained yield principles), 10 (management of visual values), 12 (interdisciplinary approach), and 14 (wetland, riparian and flood plain areas in current condition or better).

Alternative A is a flagrant land-rape alternative contrary to BLM's own planning guidelines. The Federation heartily discourages consideration of this alternative.

Alternative C: Wyoming Wildlife Federation endorses this alternative as the best management proposal of those in the EIS. This alternative apears to comply with your general and specific planning criteria, and promises the most toward maintaining the wildlife and aesthetic resources that make Wyoming unique among the lower 48 states. We would submit the following comments on Alternative C for your consideration (comments 19 - 25):

19 19. p. 75, Big Game Winter Range: We recommend consultation with Wyoming G & F concerning geophysical exploration dates. The Federation concurs with G & F on revising the dates to 11/15 - 5/1, instead of 12/1 - 5/15, so as to allow for migration protection.

This paragraph ends in an incomplete sentence, and we are left guessing that the sentence ends "crucial big game winter range," or something similar. We wonder about the 500 foot stipulation for geophysical helicopter operators. Wouldn't 500 feet result in a dead run on the part of the "pursued" animal? We suggest BLM consult Wyoming G & F concerning an adequate distance.

20 20. p. 75, Raptor Nests: See our general comment #2, concerning expansion of this species list.

continued ...

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BLM, cont. -7-

21 21. p. 75, Sage Grouse: Existing management (p. 46) appears to be more restrictive than this "wildlife" alternative. We wonder why.

Reclamation standards for lek sites ("relatively flat with no obstructions") appear open to wide interpretation by the operator. Are there no substrate, topsoil or erosion control stipulations? If not, why?

Hours of allowable non-surface disturbing activities during the strutting season should only be stated if such activities can be field checked by BLM personnel. If frequent field checks will not be possible, presence on the lek during the strutting season should be prohibited (see our General Comment #3).

22. p. 76, Oil and Gas, #1: We support the withdrawal from mineral leasing of the areas listed here.

23. p. 76, Oil and Gas #'s 2 - 6: We support these leasing alterations, as well.

24. p. 77, Reclamation, para. 1: The Federation supports the concept of reclamation through use of multiple species for soil stability and wildlife enhancement.

para. 3: Reclamation exclosures are also important if seeding efforts are to succeed. We support this practice, as well.

22 25. p. 78, Vegetation Manipulation: We recommend caution when manipulating vegetation as close as ¼ mile to a Sage Grouse lek, since nesting often may occur outside of this radius.

We also wonder which areas have been identified for grassland conversion in this 33,500 acre manipulation plan. Are these parcels primarily used by cattle at present, or do some big game herds depend on the brush species BLM intends to eliminate?

Alternative E

26. p. 83, Bald Eagle Roosting: See our Specific Comment #17.

27. p. 83, Raptor Nests: See our General Comment #2.

23 28. p. 84, Hunting Areas: We recommend restricting seismic activity during the hunting season on BLM holdings near Wasatch National forest. This would be an aid in reducing stress on big game animals at a season when they are already being stressed heavily.

Response 10-22: The available literature indicates that creating openings within dense sagebrush one-quarter mile from a sage grouse lek may enhance nesting and brooding habitat. Our policy is to design burns so that a mosaic effect is achieved. This design varies the distance of the disturbance from the lek and minimizes total impact. No specific treatment areas have been identified. As an AMP for each allotment is developed, treatment sites will be evaluated and analyzed.

Response 10-23: The consolidated public land immediately north of the Wasatch National Forest has been included in the hunting season closure (see Geophysical Exploration in Proposed Plan).

Response 10-24: See Response 2-3. Cumulative impacts would be addressed during the development of a surface use plan required for major surface disturbances.

Response 10-25: Our desire in setting a maximum allowable use level was to provide an objective on "I" category allotments for managing riparian areas. During the development of AMPs or monitoring plans for these allotments, riparian issues, if present, will be a key consideration in formulating objectives. Utilization level may be included as a short-term objective and will be set at an appropriate rate for a given riparian area but will not exceed 60 percent.

Response 10-26: We are working closely with the Wyoming Game and Fish Department on whooping crane management. In fact, the BLM is partially funding a study of whooping crane movements in the area.

Response 10-27: No such problems have been identified on public land. Wastewater disposal actions are considered on a case-by-case basis.

Response 10-28: The crucial winter range boundaries that appear in the RMP correspond to the Wyoming Game & Fish Department (WG&FD) data base. Our policy is to cooperate closely with the WG&FD to determine big game and other wildlife use areas. The WG&FD will be contacted to discuss your areas of concern.

10

29. p. 84, Riparian Areas, last line: Please refer to our Specific Comment #7.

24 30. p. 84, Oil and Gas, para. 2: Is "Crucial big game habitat" the same as crucial winter range? The threshold of 10% disturbance on such range could still become excessive if each operator is allowed such an infringement on one crucial range. Cumulative impacts could become very detrimental to big game survival at these locations.

31. p. 85, Reclamation, last 4 para's.: We support your guidelines here, and recommend BLM develop a system of site checks for the purpose of documenting successful practices and for enforcement.

25 32. p. 86, Riparian: In Ch. 3, Affected Environment, it is stated that most riparian habitat and potential riparian habitat "is in a degraded condition and supports non-riparian vegetation.... This decline can be attributed to both natural erosion and accelerated erosion caused by livestock overgrazing within the riparian zone." Further along in this same section (see pp. 120 -121), specific rivers are documented as possessing decadent or declining conditions of erosion and habitat loss:

Thomas Fork: 73% declining condition (of those miles surveyed)
Smith's Fork: 69% declining condition (")
Bear River: 6% in good condition (")
Hams Fork: 59 % declining condition (")
Black's Fork: 83% declining condition (")

With our riparian habitats experiencing siltation, lower water tables, bank trampling, decadent vegetation and gully-cutting, we wonder why BLM plans to allow 60% livestock utilization of key riparian grasses. If, as stated on p. 204, 60% is the highest allowable threshold before habitat could be lost, why is the BLM permitting these areas to subsist so poorly? The Federation recommends a lower maximum utilization threshold that would allow these habitats to recover, perhaps 45 - 50%.

26 33. p. 125. Whooping Crane: We recommend you upgrade your data on this species in accordance with recent sightings of individuals in the KRA (Dave Lockman, Wyoming Game & Fish Biologist in Smoot is managing this species).

continued ...

10

Map A:

27 34. We recommend the addition of all waste water dump sites as areas of pollution potential. Overflow, collapse and seepage potential exists at many or all of such sites.

35. We recommend the addition of all sewage treatment facilities, associated with subdivisions or muninicipalities, as sites with pollution potential. This is especially critical if a facility exists within a flood plain, as some do in Uinta County.

Map B - 1:

28 36. Revise the animal range boundaries according to input and data from local Game Wardens and the G & F data base. In particular, we ask that you investigate:

a) extending mule deer range 5 south to Fowkes Canyon;
b) blending mule deer winter ranges 4 & 5;
c) the presence of Golden Eagles at the following sites (and probably many others)
   *lower Woodruff Narrows (active nest, 1985: Kesselheim);
   *Bigelow Bench area, particularly adjacent to Piedmont road;
   *Granger.
d) adding the elk herd that winters in the Piedmont/Bigelow Bench area;
e) adding the presence of moose in the following two areas:
   *Bear River Divide (year-round), east and north of Medicine Butte;
   *Upper Bear River near the Utah state line (T 12 N, R 119 W ?).

*** END ***

11

Kiewit Mining & Engineering Co.
P.O. Box 3049
Sheridan, Wyoming 82801
(307) 672-3401

July 9, 1985

Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P. O. Box 1869
Rock Springs, Wyoming 82902

Dear Mr. Stein:

Cumberland Coal Company has reviewed the Kemmerer Resource Area, Resource Management Plan. Our comments on this plan are broken down into two areas, reclamation and wildlife. We appreciate the opportunity to comment on this Plan and look forward to receiving the final document.

Sincerely,

Roger Burton

Roger Burton
Environmental Supervisor

RB/ilf

Enc.

11

COMMENTS BY KIEWIT MINING AND ENGINEERING CO. ON THE
KEMMERER RESOURCE AREA'S RESOURCE MANAGEMENT PLAN

1 I. In the third paragraph of the "Reclamation" section on page 33, it specifies that mulch fibers should be "at least eight inches long". The first paragraph of the "Pipelines and Communication Lines" section on page 34 states that wood fiber mulch may be used. There appears to be a contradiction since fibers in a wood mulch are not eight inches long.

2 II. The "Reclamation" section on page 52 specifies that "native or non-native (if needed) 90 percent pure live seed would be drilled or broadcast...." We have found that with many of the native species it is not possible to get seed rated at 90 percent P.L.S.

3 III. Map B-1 (Wildlife) delineates areas of crucial winter range for big game species. Cumberland Coal Co. objects to the amount of area designated crucial antelope winter range situated along State Highway 189, north of Interstate 80.

Intensive studies have been conducted in this area by Cumberland Coal Co. since 1978. These studies included season aerial surveys supplemented with observations from established road routes and incidental sightings. Since 1978 there have been, in our opinion, two critically severe winters, several mild winters and several relatively "normal" winters. This broad range of winter conditions and the intensity of the studies afforded us the

Response 11-1: This paragraph is being rephrased in the Proposed Plan (see Soils) to say: "should contain fibers at least eight inches long if straw mulch is used (i.e., to facilitate crimping)."

Response 11-2: The 90 percent pure live seed refers to the amount of live seed to be planted. To attain this percentage, enough seed must be used to meet specifications in pounds per acre of pure live seed (PLS). For example: the specifications require that 15 lbs. (PLS) of intermediate wheatgrass be planted. Intermediate wheatgrass germination 80%; Intermediate wheatgrass purity = 90% (PLS = % Germination × % Purity); 80% × 90% = 0.72 (PLS); 15 lbs × 90% (PLS specifications) = 13.5 lbs. of PLS must be planted. 13.5 lbs (PLS) to be planted/O.72 (PLS factor) = 18.75 lbs.

Response 11-3: See Response 10-28.

Response 11-4: The 10 percent threshold and effective habitat concepts have been removed from the Proposed Plan.

Response 11-5: The difference in acres appears to be due to errors inherent in transferring the original data to the RMP map format. The published figure of 131,035 acres is correct.

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opportunity to thoroughly evaluate the use of the area by antelope.

During severe winters the antelope migrated out of the area in question toward the east. The antelope were confined to areas adjacent to Highway 189 during "normal" winters. Only during mild winters with below normal snow accumulations were antelope observed over the entire area defined as crucial winter range.

In its most strict definition, crucial winter range would be that which is critical to the survival of the herd utilizing the area during a severe winter. During the severe winter of 1983-84 the antelope moved completely out of the area. In a less strict definition, crucial winter range would be that which maintains the antelope population during most winters. Our data indicate that a much smaller area is needed to maintain the herd using this winter range.

Based on this discussion, Cumberland Coal Co. requests the area of crucial winter range along State Highway 189 be reduced. Cumberland Coal Co. will be happy to furnish the BLM with appropriate data to aid in the reevaluation of this winter range.

4 IV. Cumberland Coal Co. feels that the ½-mile buffer around disturbance in the definition of Effective Habitat (Issue 5, Alternative E) is excessive.

Intensive studies have been conducted on mule deer and antelope

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in relation to surface coal mine disturbance in southeastern Montana. These studies have shown that mule deer and antelope accept and prosper on areas immediately adjacent to and within surface coal mines. As well as becoming accustomed to high intensity activities, these big game species actually seek out disturbance areas which provide a diversity of topography and vegetation often not found in natural ecosystems. Similar acceptance to disturbance has been noted at surface mines in Carbon and Sweetwater Counties.

Included as Appendix A is a paper presented at the 1985 Thorne Ecological Symposium which details the reactions of wildlife species to mining activities.

Based on the above discussion, Cumberland Coal Co. requests that the ½-mile buffer be dropped from the definition of Effective Habitat found in Issue 5 of Alternative E.

5 V. In the process of reviewing the RMP, the total acreage of crucial antelope winter range within the Carter Lease Herd Unit was planimetered from Map B-1. The acreage calculated by Cumberland Coal Co. (151,000± acres) does not approximate the acres listed in Table 3-13-Affected Environment (131,035 acres). Although there may have been some error on our part due to the small scale of the map used, the 20,000 acre difference appears too large to be explained completely by scale error. Cumberland Coal Co. requests that the acreages in Table 3-13 be varified.

12

Green River Livestock Co.
106 Cedar
Rock Springs, Wyo 82901

Team Leader
KRMA
Box 1869
Rock Springs, Wyo. 82902

Dear Sir:

The following is our comments on the Kemmerer RMP and concerns only alternative E as we feel this is the alternative the BLM is most likely adopt.

1 Page 84, Reclamation.- We feel before any roads within an area are abandoned and reclaimed that the livestock permittiee should be consulted as sometimes a new road may be able to contibute to better livestock management within the area.

2 Page 85, Alotment Management Plans.- (table 2-2) We feel the bureau should select the Slate Creek alotment for number one priority. It's a large alotment with similar problems as other large alotments but it only has 3-4 permittees within it. It would probrably be easier to work with these individuals and any results obtained might set the tone and standards used in the alotments with a multitude of livestock users.

3 Page 85, Range Improvements - We feel the BLM should contribute to the maintenance of range improvements and projects that provide for multiple use benifits.

4 Page 86, Forage Increases - We feel increases should be allocated on the basis of guidelines stated in the BLM manual, Sec. 4130 and not on the basis of Wyo. Game and Fish Dept. stratigic plan numbers. Those numbers may not be compatable with existing multiple use levels.

5 Page 86, Riparian - We really don't mind what is stated in the paragraph, however, there isn't enough information available as to it's effect upon livestock grazing to present a very constuctive comment on this subject.

6 Page 86, Fish and Wildlife - The existing narative in the RMP is not specific enough to relate what it's effects might be. We would recommend the management practices considered should only apply the federal lands since the majority of important fish and wildlife habitate is located on private and state lands.

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7 Page 88, Land Resources - (Rights of Way) - The third paragraph in this narative should be deleted as it is basically a costly and impractical idea.

8 Page 88, Fire Management - The charting of the decision process concerning fires should have two charts, one for prescribed burns and one for wildfire. The narative on fire management seems to be quite vague and should be defined better. If possible all fire situations should be used or controlled to obtain a better range condition for the future.

9 Page 86, Conversions in Kind - All conversions in kind allowed since adjudication of an area should be reviewed to determine if the ratio permitted are consistent with resource conditions.

10 Table 8-2, Livestock Mgt & Veg., Alt. E - (refer to M/C alotments) "short term increases in labor and funds needed from permittees" please explain this as management and use should continue to remain about the same as is in these catagories.

11 Page 84, Geology and Minerals (domestic sheep lambing) - We feel the permittees should be notified of siesmic or drilling activity within their permitted area any time it is going to take place so potential problems can be avoided. I don't believe areas should be closed as I feel the mineral industry and the livestock industry can work things out fairly well providing there is proper notification.

12 Page 237, Riparian Areas - This "judgement" should be with the consultation of the permittees within the alotment. These people will probrably have a greater historcal knowledge of the stream than anyone else.

Page 243, Appendix A-6, (1113 Slate Creek) - The conflict is not between cattle vs. sheep, but between what operators or permittees view as proper livestock management practices within the Slate Creek Alotment.

These are our comments. Thank you for the opportunity to respond to the draft statement.

Sincerely,

Wm. Taliaferro Pres.

Response 12-1: This is our standard procedure in areas where there are no existing roads.

Response 12-2: The Slate Creek Allotment was rated as number four priority for development. Since we will work on the first four allotments at about the same time, the Slate Creek Allotment will be on nearly equal footing with the other three allotments for plan implementation and funding.

Response 12-3: Under the Range Improvement Policy, the maintenance of projects will be assigned to the major benefitting user, which is defined as the entity receiving greater than 50 percent of the benefit.

Response 12-4: The reference cited is incorrect. It should be 43 CFR 4110 or BLM Manual 4110. This regulation refers only to forage increases that become permanently available for livestock. References to forage increases in the RMP refer to increases in total available forage. From this increase in forage production, a certain percentage may be deemed usable for livestock use. This percentage would be allocated under BLM Manual 4110.

Response 12-5: The paragragh identifies riparian areas as important areas to consider when AMPs are developed. The management practices are options that may be used. They would be developed when an AMP is developed.

Response 12-6: The management practices in this RMP apply only to surface and sub-surface resources under our jurisdiction.

Response 12-7: Right-of-way sites will be fenced where feasible to enhance reclamation efforts. Upon successful revegetation of the site, fences would be removed and the area would become subject to normal grazing practices.

Response 12-8: See Fire Management Decision Chart (Figure 2-1) and revised text in the Proposed Plan.

Response 12-9: Through the implementation of AMPs or monitoring plans, we will be analyzing existing stocking rates to determine impacts on the forage base. Overstocking may be addressed through various management actions including range improvements, reducing preference, herding, changes in kind of livestock or in season of use, etc.

Response 12-10: See revised Table 2-2.

Response 12-11: This change is being implemented within the KRA.

Response 12-12: These were professional judgements based on our knowledge of the area. We have not received any comments indicating a different opinion on the riparian area for any allotment.

13

ARCO Exploration Company
Exploration Operations - Western U.S.
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Telephone 303 575 7000

July 10, 1985

Mr. Alan Stein
Team Leader
Rock Springs District Office
Bureau of Land Management
P. O. Box 1869
Rock Springs, WY 82902-1869

Re: Kemmerer Resource Area - Draft Resource Management Plan and Draft Environmental Impact Statement

Dear Mr. Stein:

Atlantic Richfield Company appreciates the opportunity to provide the Bureau of Land Management with our comments on the Proposed Resource Management Plan and Draft Environmental Impact Statement for the Kemmerer Resource Area in Wyoming. Atlantic Richfield Company, as is pointed out in the planning document, has exploration interest in the Resource Area due to the high oil and gas potential. We are, therefore, interested in how these public lands are to be managed.

1 Throughout the planning document, BLM mentions possible requirements of offsite mitigation or enhancement in terms of wildlife habitat. Page 5 states that "oil and gas companies feel that many restrictions for wildlife habitat are already too strict, that reclamation with inflexible species composition in seed mixtures is unrealistic, and that proposed 'extras' such as fencing or offsite mitigation is asking too much." We generally agree with this view. We believe that reclamation procedures must be flexible since there can be no standard requirement which is applicable to all areas. It is possible that other methods of species mixture or planting would prove more appropriate for a given area. Therefore, we encourage BLM to adopt less rigid guidelines for these activities in order to allow for a case-by-case determination to be made.

2 Of particular concern is BLM's discussion of offsite mitigation. While the term "developer" is used on page 87, we are unsure as to whether this requirement would apply only to those operations where a discovery is made or to exploratory operations as well. While we feel it is unreasonable to expect a company to provide offsite rehabilitation to replace an area under production (the area will still have to be reclaimed), we find the requirement to enhance offsite habitat for exploratory operations onerous. We believe it is inappropriate to require an operator to reclaim two areas when only one area has been temporarily disturbed. This requirement would not be cost efficient for the operator and we recommend this requirement be abandoned or, at a minimum, be modified to be less burdensome. Please refer to the

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"Guidelines for Mitigation of Wildlife Impacts" which have been developed by the Overthrust Industrial Association. We believe these guidelines are reasonable and practical while still providing the kind of protection BLM feels is necessary.

3 We are disappointed that BLM did not utilize the new Fluid Mineral Leasing Guidelines being adopted by the Bureau. These guidelines provide the land manager a decision-making tool with which to make trade off decisions between surface and subsurface resources. It also enables the public to determine exactly what these decisions are. Utilizing this system, the differences between alternatives would be more evident. For instance, it would illustrate situations where there is minimal variance among alternatives with regard to energy and mineral resources indicating a need for further review and possible revisions to the proposed plan.

4 We are confused with Appendix B where BLM indicates what standard stipulations would be applied to oil and gas leases. These appear to be special stipulations rather than standard stipulations. Are we to expect these stipulations on all oil and gas leases issued in the Kemmerer Resource Area? It would seem that these restrictions should be attached to a lease on a case-by-case basis depending upon the resource values encompassed by the lease. We don't see the rationale for attaching these stipulations on every lease as a matter of course.

5 The discussion of seismic operations in the planning documents appears to be lacking. For instance, there is no mention of the fact that impacts from these activities are relatively short term. In fact, many portable seismic operations leave virtually no impact at all. We recommend that BLM consider what type of seismic operation is being proposed before deciding which restrictions are necessary.

In conclusion, we encourage BLM to adopt our recommendations as stated in our comments. If you would like to discuss our comments, please don't hesitate to contact me.

Sincerely,

C. M. Museley
Public Lands Analyst

Response 13-1: Most restrictions include a provision that they can be waived if they are not needed or are not reasonable.

Response 13-2: See Response 2-3.

Response 13-3: See Responses 3-1 and 3-7.

Response 13-4: See Response 3-6.

Response 13-5: The type of geophysical operation proposed is always considered when formulating the restrictions to be applied.

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United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

6015.2

MEMORANDUM

TO: Alan Stein, EIS Team Leader
Rock Springs District, Wyoming
Bureau of Land Management

FROM: Mel Shilling, Chief
Mining Analysis Division, Western Technical Center
Office of Surface Mining Reclamation and Enforcement

SUBJECT: Kemmerer Resource Area Resource Management Plan/
Environmental Impact Statement (RMP/EIS)

We have reviewed the draft RMP/EIS for the Kemmerer Resource Area and have no suggestions for its improvement.

We appreciate this opportunity to participate in the review of the document and look forward to seeing the final RMP/EIS.

15

Alice I. Frait
Lands Director

Rocky Mountain
Oil & Gas Association, Inc.

340 PETROLEUM BUILDING • DENVER, COLORADO 80202
303/534-8281

July 10, 1985

Mr. Alan Stein
Rock Springs District Office
Bureau of Land Management
P. O. Box 1869
Rock Springs, WY 82602-1869

Dear Mr. Stein:

I am writing on behalf of the Rocky Mountain Oil and Gas Association (RMOGA) regarding the Kemmerer Resource Area Draft Resource Management Plan and Draft Environmental Impact Statement. RMOGA is a trade association whose hundreds of members account for more than 90% of the oil and gas exploration and production activities in the Rocky Mountain West. Because so much of of the land in RMOGA states is owned by the federal government, land management planning is of vital interest to our members, especially with regard to minerals development.

1 While we are pleased to see an alternative (A) in the plan which emphasizes development of oil and gas resources, the preferred alternative (E) incorporates little of the management direction of the oil and gas alternative; indeed, significant portions of other management alternatives have been adopted in Alternative E, but there is no allocation for resources or management practices emphasizing oil and gas.

2 The plan makes no attempt to provide mineral potential information except to state that "any part of the KRA has potential to be developed for oil and gas". This is clearly an inadequate analysis and it is obvious that the BLM's fluid mineral leasing guidelines have not been incorporated into the plan. Without such analysis, a complete discussion of tradeoffs being made among resources cannot occur, and no basis exists for determining the effects of each alternative on the ability of industry to explore for mineral resources. The analysis of mineral potential and access restrictions contained in the Fluid Mineral Leasing Guidelines should be utilized in the final plan; we also suggest using RMOGA's Energy and Mineral Evaluation System to assist in providing the required data on the geologic favorability of the resource area. Unfortunately, the plan indicates that the basis for the BLM's determination of mineral potential of the area is comments received from two companies; we would be surprised if this was the only source of information used, yet the plan does not elaborate. Moreover,

Response 15-1: Under Alternative E (in the draft EIS), the entire resource area is open to oil and gas leasing, except for Raymond Mountain. Restrictions which mitigate adverse impacts to other resources should not be mistaken as allocations of the resource area to the exclusive use of those resources. Rather, they should be viewed as management practices which help provide for oil and gas development as well as, not instead of, other resources.

Response 15-2: See Responses 3-1 and 3-7.

Response 15-3: Your comment reflects general concern over too many new restrictions on oil and gas development, without referring to any specific proposals to which you object. The revisions in the Proposed Plan should alleviate many of your concerns. Only those restrictions necessary to maintain resource values, including big game populations, are included. We feel the Proposed Plan represents a balanced approach to management of both renewable and non-renewable resources.

Response 15-4: The reclamation requirements presented in the RMP are designed to show existing practices as well as improvements in reclamation methods. Although some methods are site-specific (i.e., methods to increase effective moisture and seed mixture), others are standard

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July 10, 1985

Mr. Alan Stein
Rock Springs District Office
Bureau of Land Management

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no attempt has been made to include a map showing the mineral potential for the area so that the public can understand where potential resources might be located. Use of these two planning aides would ensure a more justifiable and balanced consideration of resource trade-offs in making planning decisions.

3 The plan also incorporates several new, particularly restrictive stipulations relating to wildlife for seismic and other oil and gas activity. It is clearly unnecessary to require additional restrictions on activities which cover large segments of the resource area when present stipulations and mitigation measures are more than adequate for the protection of wildlife. The plan itself states that big game numbers are expected to remain at or above Wyoming Fish and Game target levels. We feel therefore that additional stipulations should be applied only in unusual circumstances on a case-by-case basis and only if and when their need can be thoroughly documented and justified. We also specifically object to Appendix B-1, "Standard Stipulations for Oil and Gas Leases", since these are special stipulations normally applied only on a case-by-case basis in unusual circumstances; they are not "standard" stipulations at all. The BLM should not attempt to impose special stipulations for standard conditions on a lease, but should use standard operating stipulations. We do not object to the use of special stipulations in special circumstances so long as the stipulations can be justified. There is no justification whatsoever for the broad use of these special stipulations on all oil and gas leases.

4 Regarding site reclamation, it has been well-documented that oil and gas exploration and production activities can be safely conducted and areas subsequently reclaimed to the extent that they can even be designated as wilderness. However, the plan incorporates numerous new reclamation requirements which should, again, be applied only on a case-by-case basis as needed, and not implemented throughout the entire resource area.

5 Finally, we strongly oppose the offsite mitigation provision in the plan which would require operators to fund offsite habitat improvement for all surface disturbance in mule deer and elk crucial winter ranges. The plan attempts to impose this requirement on seismic as well as other exploration and development activities. Due to the short-term nature of many of these activities, the fact that the boundaries and size of these ranges and distribution of the herds is tenuous and indeterminate, and that fact that it is not likely that an operator would be on location during winter months anyway, we find this requirement to be unreasonable, without merit, and totally unacceptable. We further object to the 10% threshold concept for other big game crucial winter ranges and sage grouse nesting areas. These provisions are based on unsubstantiated assumptions and impose undue burdens on operators by adding unreasonable and excessive costs to operations.

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July 10, 1985

Mr. Alan Stein
Rock Springs District Office
Bureau of Land Management

page -3-

Thank you for your consideration of these comments; we hope to see some modification of the plan in response to the aforementioned concerns. We will be happy to answer any questions you may have.

Sincerely,

Alice I. Frell
Public Lands Director

AIF:cw

(i.e., reshaping, recontouring, and resurfacing with topsoil). Those methods or goals which are case-by-case or site-specific are dependent on authorizing officer recommendations.

Response 15-5: See Response 2-3.

16

PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association

330 South Center, Suite 115
Casper, Wyoming 82601
(307) 234-5333

Richard T. Robitaille
Executive Director
Wendy H. Frusaul
Associate Director

July 11, 1985

Mr. Alan Stein
Rock Springs District Office
Bureau of Land Management
P.O. Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein:

Re: Kemmerer Resource Management Plan
Draft Environmental Impact Statement

On behalf of the Petroleum Association of Wyoming (PAW), a division of the Rocky Mountain Oil and Gas Association, whose members account for more than 90% of the petroleum produced and 90% of the wells drilled in Wyoming please accept the following comments on the Draft Resource Management Plan for the Kemmerer Resource Area.

1 The majority of our comments will concentrate on the Preferred Alternative (Alternative E) since it is the obvious selection of the KRA and has been carefully constructed to reflect the desires and intentions of the management team. The various other alternatives appear to separately emphasize the existing management programs in the KRA including oil and gas, grazing, wildlife, etc. While we are pleased to see an alternative which emphasizes the development of oil and gas resources, we are concerned that this alternative (A) was written in relatively unrealistic terms therefore limiting its usefulness and proper consideration. The Preferred Alternative incorporates few of the management directions from the oil and gas alternative, drawing only on some aspects of livestock grazing. There was evidently never any intent to incorporate any of the resource allocations or management practices emphasizing oil and gas into the Preferred Alternative. This we find regrettable. On the contrary we find that significant portions of other alternatives such as Alternative C, which emphasizes fish and wildlife resources, have been adopted in Alternative E.

2 Improper consideration of energy and minerals is indicative of an imbalanced multiple use plan. We fail to see the Fluid Leasable Mineral Guidelines incorporated into the RMP. Inclusion of that analysis and use of the guidelines would assure more balanced consideration of the tradeoffs among resources when making management decisions. Failure to fully consider the effects of surface management decisions on the subsurface estate will seriously flaw the management plan.

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330 South Center, Suite 115
Casper, Wyoming 82601

3 The Preferred Alternative proposes a more aggressive H_2S program, p.84. The RMP is not clear as to what areas or in what cases these additional requirements will be imposed. The text indicates that additional data may be required in areas of "poor dispersion potential" with reference to Map A. Map A, however, does not use that same designation. Instead it identifies areas of high, medium or low "pollution potential." These incompatible references are confusing and should be clarified.

The additional stipulations for wells in areas of poor dispersion potential such as onsite collection of meteorological data and the preparation of a detailed dispersion analysis will impose a substantial burden upon the operators drilling in the KRA. Except for rare instances these requirements over and above appropriate H_2S contingency plans are unnecessary. There are adequate provisions in existing regulations to require additional data if necessary.

4 There are several new wildlife stipulations for seismic and other oil and gas activities in the Preferred Alternative which cumulatively create a program much stricter than existing management. There are several statements in the RMP noting that despite some short term impacts, big game numbers are expected to remain at or above Wyoming Game and Fish objective levels. In light of such projections, additional blanket restrictions covering large segments of the resource area do not appear to be necessary. A need for across the board restrictions should be documented and justifiable, otherwise these stipulations should only be applied on a case-by-case basis when justified.

5 There are numerous new requirements relating to site reclamation such as an optional response format (ERRP), rehabilitation techniques and offsite mitigation which we would like to address.

The use of the ERRP (Appendix C) may be appropriate for large field development or large gas processing plants, but it should be considered optional in those cases. Such a detailed outline is not appropriate for the drilling of one well.

6 We note that some additional reclamation practices are suggested such as mulching, supplemental topsoil, and installation of snow fences, p.85. We recommend that such specific reclamation techniques continue to be applied on a case-by-case basis as needed and not become universal requirements.

7 PAW strenuously objects to the introduction of the concept of "offsite mitigation" to compensate for the alleged loss of wildlife habitat, p. 87. Alternative E states that offsite mitigation would be required for all surface disturbance in the most important mule deer and elk crucial winter range. In these cases as referenced on Map B, a stipulation is going to be added to the lease requiring the developer to fund offsite habitat improvement at a cost based on the acres of effective habitat disturbed.

Response 16-1: See Response 15-1.

Response 16-2: See Responses 3-1 and 3-7.

Response 16-3: The final RMP reflects that a contingency plan would be required for drilling in areas where there is potential for an occurrence of high concentrations of air pollutants. The areas of poor dispersion correspond to areas of high pollution potential on Map A.

Response 16-4: See Response 15-3.

Response 16-5: Although the extent of disturbance for one well is considerably less than that of a large field development, the disturbance still requires reclamation. Appendix C identifies goals, time frames, and methods to facilitate successful reclamation of a disturbance. The detail and scope of this portion of the surface use plan would be commensurate with the type and extent of disturbance planned.

Response 16-6: Additional reclamation practices are dependent on circumstances such as limited moisture and loss of topsoil. These measures are site-variable. Regardless of the methods used, the goal is successful reclamation, reflecting a predetermined land use.

Response 16-7: See Response 2-3.

16

330 South Center, Suite 115
Casper, Wyoming 82601

We find this requirement completely objectionable. This practice may conceivably be appropriate for very large scale projects, but it should not be a routine expectation. This requirement would be open to abuse and place unreasonable costs upon an operator in the KRA. The boundaries and size of these crucial winter areas and the distribution of the herd units are often vague and tenuous. To be required to provide alternate habitat when an operator may not even be on location during the winter, and when reclamation of a site is planned and may even be underway, is totally inexplicable.

Similarly, we object to the introduction of the 10% threshold concept for all other big game crucial winter ranges and sage grouse nesting areas. This provision is totally inappropriate and is based on unsubstantiated needs and assumptions. The drilling of a well is a short term disturbance of a small area which will be reclaimed within a reasonable time frame. Requirements to enhance or supplement wildlife habitats are inappropriate impositions upon the operator.

PAW cannot support the Preferred Alternative in its present form. We hope the points we have raised and questions we have posed will be resolved in the final draft.

Thank you for the opportunity to comment.

Sincerely,

Wendy Fruseauf

Wendy H. Fruseauf

cc: Don Sweep
Hillary Oden
D. Thomas Kidd
Alice Frell

17

CGG LAND SEISMIC
A DIVISION OF CGG AMERICAN SERVICES, INC.

July 10, 1985

Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P.O. Box 1869
Rock Springs, WY 82902-1869

Dear Mr. Stein,

CGG American Services,Inc. appreciates the opportunity to comment on the Kemmerer RMP which is nearing its final form. CGG has been quite active for many years as a contractor for geophysical exploration in this important area and, as such, feels qualified to discuss concerns that could affect our industry for the future. We helped in the original formulation of acceptable techniques for portable shooting and continue to help fine tune our industry's operations with funding and support for wildlife and environmental concerns.

Overall, the working environment on the KRA has been fairly predictable and without unnecessary restraint or laxity. Yet we now sense that the Bureau has chosen to follow a course which tends to restrict unduly the geophysical industry.

While the discussion for Alternative E is seemingly neutral in granting and taking away prior possibilities, a basic mistake is made by comparing apples to oranges wherein two good changes plus two bad changes equal no net change. For example, page 200 Geology and Minerals states "The impacts to geophysical operations would be mixed, compared to Existing Management." One then reads of an impact that is worse (calving,roosting buffer zones, nesting areas, winter ranges), one that is questionably better (lambing areas that are not occupied should by common sense be available for exploration), one that is the same (hunting closure as now in effect), another that is worse (muddy areas are already excluded from operations but seem to be now more restrictive) a third that is

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DENVER, COLORADO 80202

303 825 2277
TEL TELEX 45278
CABLE: CEGECOL DENVER

Response 17: The restrictions in the RMP are designed to allow geophysical operations to occur with minimum adverse impact to the environment. Hopefully, the RMP will be a useful tool in planning and coordinating your activities.

17

Alan Stein: page 2 KMR RMP

worse (riparian area restriction 300' each side), and a fourth that is clearly worse (bridge building and required portable operations).

These changes will require drastic increases in the cost of operation if implemented and the policy shows a dangerous tendency on the part of government to legislate the type of operation that will be allowed. When industry is not able to choose its methods of operation assuming the terrain is accessible, serious reductions in the quality of data is a possible consequence.

Consider the geophysical restrictions for wildlife under Existing Management versus the Alternative E proposal with a theoretical seismic line proposed in the north half of the KRA. Under existing management a company with bad luck could experience delays of up to 9.5 months depending on the closure dates and the date of filing the Notice of Intent. Under Alternative E the delays and restrictions increase and far outweigh the positives. It seems incongruous that while wildlife has probably already experienced the impacts of geophysical work (if there are any), the conclusion of the environmental consequences common to all alternatives quotes on page 149, "...None of these (effects) are expected to be significant or long-term. Big Game numbers are expected to remain at or above Wyoming Game and Fish objective levels." With crew operations definitely lower than in previous years, there should be adequate protection under Existing Management or some other more acceptable alternative available to industry.

We feel that the KRA should reassess its proposed restrictions under Alternative E for geophysical work and make them more manageable for industry, or, vacate the proposed choice and return to Existing Management as it concerns our operations. No other alternative gives moderate, workable solutions to the varied concerns which need to be worked in concert with our countries need for domestic oil resources.

I would be happy to work with the Bureau to show quantitatively our industry's condition and the effects more expensive or lengthy delays will have on our future. I suspect though, that the lack of work in the area is already quite obvious.

Respectfully submitted,

F.E. Woodward
Permit Supervisor

18

[Typed reproduction of handwritten original.]

Dear Mr. Stein, Thursday July 11, 1985

I would like to take this opportunity to comment on the Kemmerer RMP. I have had a chance to look at the document although I have not studied it closely.

I have been working in this part of the state for the last six years, the last two as an archeologist working in connection with the Exxon Shute Creek gas project and LaBarge oil field. The opinions I have come as a result of working on federal lands for oil and gas development, and recreating on these lands at all times of the year.

My primary concern about the Kemmerer RMP is the need to place tighter
1 stipulations and controls on oil and gas development and geophysical explorations. The quality of the overall environment and wildlife habitats should be maintained or improved in the up coming years. The B.L.M.'s preferred alternative appears to address this issue however I would like to see more done to protect the wildlife and environment. More specifically, I am in favor of withdrawing important wildlife habitat from mineral leasing. I think the Raymond Mountain area should recieve special attention by being
2 closed to mineral leasing and all snow machines and ORV's. I'm in favor of restricting snow machine use in important wildlife areas as outlined in Alternative C, and I also agree with the need to limit ORV use in general.

I think the B.L.M. should work very hard to protect the wildlife, environmental, and cultural resources of this area even at the expense of limiting oil & gas development and geophysical exploration. The major mineral development which is occuring on B.L.M. lands is causing adverse effects to all other resources and resource users. On page 83 of the RMP, the Preferred
3 Alternative states "No resource user would be emphasized to the overall detriment of others." It is my belief that the current Exxon Shute Creek and LaBarge oil field project is operating to the detriment of all other resource users (hunters, campers, ranchers, and viewers of the landscape). Does this mean that under the Preferred Alternative another massive Exxon-like project would not be permitted? A vast amount of federal land has been turned into a sour gas field with serious and unknown disturbances to our public lands. I would not like to see another project like Exxon's to happen again in this area. I also think that an equal amount of land should be turned back over to those resource users who lose out to those big projects. It appears to me that all too often oil & gas and geophysical companies from out of state try to dictate how to manage our lands.

I hope the B.L.M. takes serious steps towards preserving the quality of the federal lands. We must protect the environment and wildlife for all to use, not abuse.

Thank you,
Sincerely Jamie Schoen
1337 Canyon Rd. - 2B
Kemmerer Wyo. 83101
Steven Doran

Response 18-1: Under the alternatives, various degrees of restrictions on surface-disturbing activities were considered. They were designed to minimize or eliminate adverse impacts to other resources. The Proposed Plan includes a provision that offsite mitigation would be considered for larger surface disturbances in crucial winter range.

Response 18-2: The Raymond Mountain WSA remains closed to oil and gas leasing pending a Congressional decision on wilderness status. For existing leases, only operations which meet the "non-impairment" standards (for wilderness) will be permitted off existing trails. The Raymond Canyon trail will be be open to ORV use. The Proposed Plan describes how the area would be managed if Congress decides against wilderness designation.

Response 18-3: Some parts of the KRA would be used more by one resource user than by others under any multiple use plan. Some uses are compatible with other uses and some are not. The quoted statement refers to the management of the resource area as a whole. It is not intended to refer to the management of each acre within the KRA.

19

SWEETWATER COUNTY
WILDLIFE ASSOCIATION

July 11, 1985
Alan Stein, Team Leader
Kemmerer DEIS
Rock Springs BLM District Office
Box 1869
Rock Springs, Wyo. 82902-1869

Dear Mr. Stein:

Following are comments of Sweetwater County Wildlife Association concerning the Kemmerer DEIS. SCWA is the largest and oldest wildlife organization in southwest Wyoming.

We support the wildlife alternative "C," over the preferred alternative "E." Although alternative E does afford wildlife and wildlife habitat some consideration, it falls far short of insuring that this resource will be protected.

1 We disagree that "No oil and gas leasing," and "No surface occupancy" should be dropped from study as an alternative. When leases come up for renewal, or reissue, if they are in critical wildlife habitat areas where damage to the wildlife resource would be considerable, the lease should not be allowed.

2 In areas where surface occupancy will cause irrepairable damage to wildlife resources, either no occupancy, directional drilling, or ample offsite mitigation should be required. In either case, BLM should consult with Game and Fish and carefully weigh their recommendations.

Page five includes statements from the industry that reclamation standards are to strict. We have heard this story for years, while topsoil from disturbed areas silts in our streams and rivers and habitat that once supported healthy populations of wildlife now provide mostly noxious weeds. Reclamation and offsite mitigation should be of the highest priority.

3 Riparian areas which provide habitat for great numbers and species of wildlife should receive much more consideration than is shown in any of the alternatives. Since BLM has noted that most of the riparian communities are in poor or declining condition it would seem that protection and enhancement of these areas should be a top priority.

4 We do not agree that 60 percent of grasses in a riparian zone can be grazed without severely damaging the habitat. This seems to be business as usual, which has caused the problem in the first place. Further, AUM's should not be increased on any livestock allotment until riparian areas are restored and protected.

19

5 Present stipulations for exploration and development near sage grouse strutting grounds and nesting areas gives good protection to this resource. Why do you propose to make regulations less restrictive?

6 Throughout the DEIS are references to drift fences, pastures, etc. This translates into rest-rotation grazing systems which our organization bitterly opposed during the Big Sandy EIS comment period. After an irate public had their say, BLM backed off their proposal to erect hundreds of miles of fencing in this area. Is BLM now proposing rest-rotation grazing systems in the Kemmerer Resource Area?

7 Whoever decided that BLM should sit and wait for 15 years to determine if forest regeneration was occurring evidentily knows very little about silvaculture and reclamation. Three to four years is ample time to determine if regeneration is sufficient. If not, planting should begin.

8 We ask that Game and Fish be consulted in advance before any of the thousands of acres slated for vegetative manipulation are touched. If history is a teacher, then BLM has a bias for manipulating forbs and shrubs out of the picture in favor of grass for cows.

Thank you for inviting our comments.

Elsie McCaskill

Elsie McCaskill, President, SCWA
for the Board of Directors
716 Pennsylvania Ave.
Rock Springs, Wyo. 82901

2

Response 19-1: See Response 10-4.

Response 19-2: We agree. The ability to apply various stipulations outlined under the Proposed Plan on a flexible basis should address your concerns.

Response 19-3: Riparian areas have been identified as areas which may require intensive management in site-specific cases.

Response 19-4: Our desire in setting a maximum allowable use level was to provide an objective on "I" category allotments for managing riparian areas. During the development of AMPs or monitoring plans for these allotments, riparian issues, if present, will be a key consideration in formulating objectives. Utilization level may be included as a short-term objective and will be set at an appropriate rate for a given riparian area but it will not exceed 60 percent. If an allotment responds to management and additional forage is permanently available for livestock, this forage could be allocated under 43 CFR 4110. Additional forage would not have become permanently available if the riparian areas had not responded to management.

Response 19-5: Existing management has been modified slightly by the statewide standardization of stipulations. The Proposed Plan (see Geophysical Exploration) gives several examples of instances where the sage grouse restriction may be modified. This allows local management flexibility without adversely impacting sage grouse populations.

Response 19-6: See Response 10-13.

Response 19-7: See Response 10-15.

Response 19-8: Wyoming Game and Fish Department will be consulted prior to vegetation manipulation.

20

Defenders OF WILDLIFE

July 8, 1985
Alan Stein, Team Leader
Rock Springs BLM District Office
P.O. Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein:

Defenders of Wildlife has reveiwed the Kemmerer Resource Area Management Plan and Draft EIS and offers the following comments:

General Comments

This DEIS is is easy to follow, to understand, and the historical portion is helpful. The authors are to be complimented. The degree of expertise between this document and some written only a few years ago, such as an EA concerning a gas well being drilled in the Kemmerer area into a formation that contained hydrogen sulfide, is considerable. The wildlife section of this EA referred to "high and low nesting birds," and "seasonal snakes and lizards." It would have been interesting, if one had the time, to watch all the little snakes and lizards heading south for the winter.

We do find parts of this DEIS that are so far removed from reality that their inclusion constitutes a waste a paper, time involved by the DEIS crew, and our time in reviewing them. For instance, a statement on page 66 notes, "Logging activities would not be restricted near riparian areas except for required crossings on major perennial streams. Clearcutting could occur adjacent to riparian areas to benefit logging needs." Statements such as this detract from the real issues and leave one wondering if rape-and-ruin alternatives such as this are really considered as a possibility. Are they?

We support adoption of alternative C, the Wildlife Alternative, over the preferred alternative E. We believe this DEIS is in error in eliminating from study, "1) No Oil and Gas Leasing," and "2)Areas of "No Surface Occupancy" Restrictions in the Most Critical Parts of Big Game Winter Range."

Specific Comments

1. pg. 5-6, Reclamation: Until a few years ago, the solution to reclamation provided by many in the minerals and oil and gas industry was to scatter a few handfuls of crested wheat and then produce a TV commercial extolling their sacrifices to restore the land. Opposition by industry to strict federal and state reclamation standards is well documented.

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NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

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Wyoming is in the enviable position of having it's cake and eating it too, providing that those who mine our resources are not allowed to abdicate their responsibility to the land and the wildlife. Wyoming's second largest industry, after minerals and oil and gas, is "Outdoor Wyoming," which includes recreation, tourism, and hunting and fishing. Outdoor Wyoming becomes more valuable in dollars returned to our state each year. We can develop our mineral resouces and enjoy the jobs and dollars and lower taxes these industries bring to our state, but we cannot bow to demands that reclamation standards are too strict, inflexible, and costly.

Certainly, reclamation on this semi-arid land is a long way from reaching state-of-the-art. But we are learning, and we are not "asking too much" to insist that industry heal the wounds they inflict, and where they cannot be healed, to provide an equal amount of offsite mitigation.

1 2. pg.9, Planning: Will implementation of the final form of this document render present MFP's inoperative, or changed?

2 3. pg.8 (14), Riparian: Wetland and riparian habitat in this area has been severely impacted by livestock grazing. Given BLM's track record of protecting or restoring riparian and wetland areas, the statement that these areas will be maintained in current condition or better leaves a lot to be desired. The plan proposes enhancement and re-establishment of only 200 acres of riparian habitat. BLM has identified most of the Kemmerer Resource Area as having declining riparian zones. We believe restoration and protection of these areas throughout the resource area should be a priority.

3 4. pg.11, Oil and Gas Leasing: When leases in the KRA expire, especially in areas of critical wildlife habitat, we believe consultation with Wyoming Game and Fish Department should be pursued and these leases not reissued if impacts cannot be mitigated.

4 5. pg.11, No Surface Occupancy: In each case where surface occupancy will cause severe impacts on wildlife and habitat, no-occupancy, directional drilling, or offsite mitigation should be mandated.

6. pg. 33, Reclamation: This section is excellent. The sentence, "Only species adaptable to local soil and climatic conditions will be utilized," should also include, "and first consideration will be given to plant species utilized by wildlife and livestock."

5 7. pg.35, Riparian: The statement, "...when developing livestock grazing systems and pasture designs." infers that BLM is planning to forge ahead with public land rest rotation grazing systems. The miles of fencing required by these grazing systems are opposed by a huge majority of the public and are detrimental to wildlife. BLM proposed in the Big Sandy EIS that 650 miles of

2

Response 20-1: This RMP will replace the MFPs.

Response 20-2: We agree that wetland and riparian areas should be a priority. As a general planning document, the RMP does not define specific objectives for all activity plans. The reference to a specific number of acres has been removed to alleviate your concerns that riparian improvement will be limited to only 200 acres. Additional miles and acres will be identified for improvement as activity plans are proposed.

Response 20-3: See Response 10-4.

Response 20-4: See Response 10-4.

Response 20-5: See Response 10-13. Some public review of AMPs is provided through permittee meetings, Game and Fish coordination, the Grazing Advisory Board, and the Multiple Use Advisory Council. BLM has no plans to specifically include other organizations in this process.

Response 20-6: Only animal toxicants approved by the Environmental Protection Agency are used on public lands. They are used by U.S. Fish and Wildlife Service personnel.

Response 20-7: See Response 10-15.

Response 20-8: You are correct.

Response 20-9: See revised text under the Proposed Plan.

Response 20-10: See Response 19-5.

Response 20-11: The sentence has been removed from the Proposed Plan.

Response 20-12: All raptors may receive protection under the new oil and gas leasing guidelines (see Proposed Plan and Appendix B-1). All sensitive raptors, including those you mentioned, will be protected from disturbance.

Response 20-13: See Response 10-8.

Response 20-14: See Response 19-4.

Response 20-15: See Responses 10-13 and 20-5.

20

fencing be constructed on public land to accommodate livestock operators. The Little Colorado Desert was to be fenced into thirds, and those thirds into thirds. Opposition to this proposal was overwhelming and BLM agreed they had made a bad decision.

Today, now that the furor has quieted, BLM is slipping in the back door, with a few miles of drift fence here, a few miles there, and when a cross fence is built, presto, you have a rest rotation pasture. Not only do the pastures provide a vested interest on public land to ranchers, they also diminish wildlife resources and restrict access to public land.

If BLM is planning to develop extensive rest rotation grazing systems in the Kemmerer Resource Area, the issue should be aired in public meetings and the public should be afforded the opportunity to present written comments on each and every proposed fence.

6 We agree that Game and Fish should be consulted in advance on all vegetation manipulation projects. Regarding Animal Damage Control, the use of toxicants should not be permitted anywhere in the resource area.

7 8. pg.40, Regeneration: Fifteen years is much too long to wait for natural forest regeneration to take place. If adequate regeneration has not occured within 3 to 4 years, the area should be planted. Further, the tender shoots of reclamation planting attracts both livestock and wildlife and most areas will require fencing for successful reclamation.

8 9. pg.11, Deer: Oil and gas development in the southern portion of the Bear River Divide includes critical mule deer winter range - as well as summer range.

9 10. pg.65, Vegetation Manipulation: Please clearify. This could be construed to mean allotment objectives include developing grass for cows across big game ranges.

10 11. pg.75, Sage Grouse: Present regulations for protecting leks and nesting habitat appear to be more restrictive than proposed stipulations. We recommend that existing regulations be retained.

11 12. pg.75, Geophysical: You left a sentence incomplete. "...500 feet from big game within". Allowing helicopters to fly 500 feet from big game is much too close.

12 13. pg.75, Raptor Nests: In regard to raptor nests throughout the DEIS we believe nesting habitat for the Merlin and Coopers hawk should recieve the same protection as listed raptors. Further, before long the whooping crane may begin nesting in this resource area. Protection of habitat suitable for this bird should be a priority.

20

13 14. pg.84, Riparian: The sentence that reads "Reestablishment of riparian vegetation would often be a key objective.", leaves a bit to be desired. Would not the word "always" instead of "often" lend more credence to BLM's concern for riparian zones.

14 15. pg.86 Riparian: Please explain rationale for allowing 60 percent utilization of riparian grasses. To reach this level of use, livestock will have overgrazed willow communities and stomped much of the habitat out of existence. Overgrazing of riparian/wetland areas has severely diminished habitat for great numbers of both mammals and birds. Enhancement of riparian areas cannot be achieved by allowing 60 percent utilization.

15 16. pg.232, Fences: Again, the inference that rest- rotation pastures will be constructed throughout the DEIS area. We reiterate; public meetings and a time frame for written comments should be provided, separate from this DEIS, on any proposed rest-rotation fencing. Further, Game and Fish recommendations concerning each mile of fence should be given careful consideration. Livestock allotments that contain riparian areas on public land should not be allowed any increase in AUM's until restoration and protection of this habitat is accomplished.

Thank you for inviting comments from Defenders of Wildlife on this important DEIS.

Sincerely,

Dick Randall

Dick Randall, Great Basin representative

21

STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE 82001

ED HERSCHLER
GOVERNOR

July 10, 1985

Mr. Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
P.O. Box 1869
Rock Springs, WY 82902-1869

Dear Mr. Stein:

The draft Resource Management Plan and Environmental Impact Statement for the Kemmerer Resource Area has been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use.

You will note that agency support for the various alternatives reflects the different agency perspectives and missions. For example, the Wyoming Oil and Gas Conservation Commission strongly supports Alternative A with its emphasis on reduced restrictions for oil and gas exploration and development, while the Game and Fish Department and the Wyoming Recreation Commission prefer Alternative C which emphasizes wildlife and recreation resources. However, in general it appears that the agencies could live with Alternative E, the BLM preferred alternative. This alternative seems to be a legitimate attempt to balance mineral development needs with other resource uses under accepted multiple-use concepts. As is normally the case, the preferred alternative may need refinement in response to agency, industry and general public input on the draft plan. Further, the final plan should contain sufficient flexibility to
1 adjust activity restrictions and mitigation and reclamation requirements as experience is gained in what is useful and successful vs what is unnecessary or unreasonable.

Thank you for the opportunity to review and comment on this proposed plan. If your study team wishes to meet with state agencies to discuss the enclosed comments, please contact Paul Cleary (777-7574) at my State Planning Coordinator's Office.

Yours sincerely,

Ed Herschler

EH:pcl
Enclosures
cc: Hillary Oden w/encl.

Response 21-1: The intent of the plan is to provide sufficient flexibility to enable exceptions to be made when a restriction is unreasonable or unnecessary.

22

SO-189

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Economic Planning and Development

HERSCHLER BUILDING CHEYENNE, WYOMING 82002 JOHN NILAND
EXECUTIVE DIRECTOR

MEMORANDUM

Administration
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Industrial Division
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Water Division
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Mineral Division
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Library
(307) 777-6430

TO: Ann Redman
FROM: Dean N. Rud
DATE: June 10, 1985
SUBJ: Kemmerer Resource Management Plan (Review)

The E.I.S. uses the best available tools to do the analyses. The main tool in arriving at these analyses is an Input-Output Model developed by John McKeen of Colorado State University. However, as the Model exists now, it can only do analyses by B.L.M. Districts. The major affected areas in the K.R.M. Plan are Lincoln and Uinta Counties. The Input-Output Model data for this region also includes data for Sublette and Sweetwater Counties. For this reason, some of the conclusions may be misleading, resulting in either an overstatement or understatement of the impacts.

23

JUN 10 [redacted]

Ed Herschler
Governor

Wyoming State
Archives, Museums & Historical Department

ROBERT D. BUSH, Ph.D.
Director
307-777-7311

Barrett Building, Cheyenne, WY 82002

John A. Yelvington
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Evanston

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Cheyenne

Jerry Riffahan
Buffalo

Mary Guthrie
Cheyenne

June 7, 1985

Mr. Dick Hartman
State Planning Coordinator
Herschler Building
Cheyenne, Wyoming 82002

RE: §BLM Kemmerer Resource Area Management Plan

Dear Mr. Hartman:

Richard Bryant of our staff has reviewed the aforementioned management plan. Thank you for giving us the opportunity to comment.

Alternative C appears to have the fewest potential effects on cultural resource sites. However, any alternatives would be acceptable to SHPO provided that adequate cultural resource identification, evaluation and protection measures are conducted prior to any actions which may adversely affect historic or archeological sites.

Sincerely,

Mark Junge
Deputy SHPO

FOR:
Dr. Robert D. Bush, Ph.D.
State Historic Preservation Officer

MGJ:RLB:klm

24

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION [redacted] 1985

123 WEST 25TH - HERSCHLER BLDG. CHEYENNE, WYOMING 82002

ALBERT BARTHOLF II
Director
777-7695

May 14, 1985

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearing House
Herschler Building
Cheyenne, WY 82002

Dear Mr. Hartman:

RE: 85-189

The Kemmerer Resource Area Management Plan seems to adequately address the responsibility for Historic Trails. BLM is currently developing a Comprehensive Historic Trails Management Plan for the Oregon-Mormon Pioneer National Historic Trail that will also address other historic trails associated with that historic route.

The KRA Management Plan refers to the BLM Comprehensive Historic Trails Management Plan for specific management and protection practice.

Sincerely,

Gary Stephenson
State Trails Coordinator

GS:sag

ALBERT FALCK
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25

THE STATE OF WYOMING

MAY 21 1985

ED HERSCHLER
GOVERNOR

State Engineer's Office

HERSCHLER BUILDING CHEYENNE, WYOMING 82002

May 20, 1985

M E M O R A N D U M

TO: Paul Cleary, Natural Resources Analyst
State Planning Coordinator's Office

FROM: Louis E. Allen, Water Resources Engineer LEA

SUBJECT: State Identifier Number 85-189, Kemmerer Resource Area Management Plan Draft EIS, BLM, March 1985.

Our concerns over the protection of the quality of surface and undergound waters seem to be well addressed. The developments for livestock and wildlife drinking water would, of course, deplete the quantity of the water resources.

The water developments, whether reservoirs, wells, or spring developmments, must be under the appropriate State Engineer permits prior to any construction on them. With this proviso, I see no problems from this office with the BLM preferred alternative.

Thank you for the opportunity to review this DEIS. Your referral memorandum is being returned as requested.

LEA/ht

cc: George L. Christopulos
State Engineer

26

State of Wyoming

Oil and Gas Conservation Commission

GOVERNOR ED HERSCHLER, CHAIRMAN

COMMISSIONERS

HOWARD M. SCHWAAR GARY B. GLASS MARVIN A. KELLER BERN WHITTAKER

STATE OIL AND GAS SUPERVISOR
DONALD B. BASKO

April 30, 1985

Richard Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

Re: Kemmerer Resource Management Plan,
State Identifier Number 85-189

Dear Mr. Hartman:

I am in receipt of a copy of the above Natural Resource Management Plans. As you are aware the Kemmerer Resource area lies in the fairway of the Wyoming portion of the Overthrust Belt. Even though the activity in that area now has diminished, the potential is still present. With the right economic incentives, the activity will start again.

I therefore strongly recommend alternative A which emphasizes a reduction in the restrictions on oil and gas exploration and development. Early predictions of the potential reserves exceed one billion barrels of oil and ten trillion cubic feet of gas. Now is not the time to put these lands in such a status so that it would be difficult or impossible to explore them in the future.

Very truly yours,

Donald B. Basko

Donald B. Basko,
State Oil and Gas Supervisor

DBB/lam

777 WEST FIRST STREET, P.O. BOX 2640, CASPER, WYOMING 82602 (307) 234-7147

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THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Department of Environmental Quality

LAND QUALITY DIVISION

HERSCHLER BLDG. THIRD FLOOR
122 WEST 25TH

TELEPHONE 307-777-7756

CHEYENNE WYOMING 82002

MEMORANDUM

TO: Robert E. Sundin, Director

FROM: Roger Shaffer, Acting Administrator RS

DATE: May 15, 1985

SUBJECT: Request for Comments on Kemmerer Resource Management Plan.

The Land Quality Division of the Department of Environmental Quality has no specific comments on Kemmerer Resource Management Plan.

If any mining of materials is necessary as a part of this plan then the individual performing that mining must contact the Department of Environmental Quality, Land Quality Division.

We thank you for the opportunity to review this document.

RS:KMO:clw

28

DIRECTOR AND STATE GEOLOGIST
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—PETROLEUM

LABORATORY TECHNICIAN
JAY T. ROBERTS

MEMORANDUM

To: State Planning Coordinator
From: Geological Survey of Wyoming
Gary B. Glass, W. Dan Hausel,
Richard W. Jones, James C. Case,
and Ray E. Harris
Subject: Kemmerer Resource Management Plan
(State Identifier 85-189)
Date: June 17, 1985

We have reviewed the Kemmerer RMP and submit the following comments:

1 Page 98: The Bridger Formation should be mentioned as it crops out over most of the southern portion of the study area.

2 Page 99, second column, last paragraph: Amoco's estimate of reserves was made for five groups of fields, not for five fields.

3 Page 102, Coal section: Hasn't the North Block tract been leased? "Subbituminous" is not spelled with a hyphen.

4 Page 102, Trona section: The Wilkins Peak Member is misspelled here and elsewhere in this report.

5 Page 102, Table 3-6: In the heading, "Billion" should be moved to the left under "Gas".

6 Page 105, Map 12: The proposed Twin Creek and North Block coal mines are not shown on this map. Pittsburg and Midway Coal Company is misspelled. There is no "h" in Pittsburg.

7 Page 107, Locatable minerals: There is a potential for some locatable minerals which are not included in this discussion. Specifically, there are no discussions of silver, gold, chromium, cobalt, vanadium, molybdenum, nickel, and zinc. Copper, silver, and zinc have been found in the Wells Formation in Watercress Canyon just north of Fossil Butte National Monument.

. . . . .

Response 28-1: A sentence will be added to mention Bridger Formation.

Response 28-2: Text has been changed to reflect the fact that groups of fields, rather than individual fields were involved.

Response 28-3: Text has been clarified to reflect the fact that North Block, Twin Creek, and South Haystack project areas are leased. "Subbituminous" corrected.

Response 28-4: The spelling has been corrected.

Response 28-5: The correction has been made.

Response 28-6: Twin Creek and North Block Proposals were left off the map due to the lack of a recent mining plan on file with BLM for either area. However, the map key needs clarification. We will note the corrections on our base maps.

Response 28-7: We added a paragraph to emphasize the fact that other locatable minerals are found in the area. However, the historical and present activity for those minerals in the KRA and the market forecasts for the forseeable future indicate that the potential for activity in the KRA during the life of the plan is quite low.

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State Planning Coordinator — June 17, 1985
Page 2

Page 107, Locatable minerals (continued)

Traces of a number of metals have also been detected in black shales of the Phosphoria Formation along the Wyoming-Idaho border with the Kemmerer Resource Area (KRA). Wherever the KRA is underlain by the Phosphoria Formation, there is some potential for finding one or more of the strategic metals listed above as well as titanium and uranium. Contact W. Dan Hausel of our office for specific references to strategic metals.

8 Page 108-109, Geological hazards: The seismic hazard analysis should be expanded. U.S. Geological Survey Open-file Report 82-1033, "Probabilistic Estimates of Maximum Acceleration and Velocity in Rock in the Contiguous United States", provides additional information.

9 Page 108, 3rd and 4th paragraphs, right column: Many landslides occur in the Bridger Formation, specifically where other materials have been deposited on it (i.e., glacial deposits, Bishop Conglomerate, and terrace deposits). Contact Jim Case of our staff for additional information on geological hazards.

10 Page 133, Mining: FMC's formcoke plant near Kemmerer also uses coal, which they mine at the Skull Point Mine (200,000t tons per year).

Pittsburg and Midway's Kemmerer Mine provides coal to several other trona plants in Sweetwater County as well as exporting coal to out-of-state users.

11 Page 134, Table 3-21: We don't understand why coal production from Sweetwater County is included in this table because none of the mines operating in Sweetwater County in 1977 were located in the KRA. At best some house coal mined from within the KRA (Kemmerer area) was sold in Sweetwater County, and the Stansbury Mine in Sweetwater County supplied some coal to a trona plant in the KRA.

12 Page 138, Social setting and lifestyles: It should be noted that coal mining centered around Evanston in the early days of mining (1865-1895) and then shifted to the Kemmerer-Diamondville area.

13 Page 185-186, Alternative C, Geology and minerals: This section does not discuss the effects that Alternative C would have on the mining of locatable minerals other than placers. "No surface occupancy" provisions would certainly affect mining of locatable minerals.

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State Planning Coordinator — June 17, 1985
Page 3

14 Page 200, Geology and minerals: See above discussion for pages 185-186.

15 Page 214: The definition of trona is in error. Trona deposition is not restricted to "ancient" lakes.

Response 28-8: The additional analysis will be provided in site-specific environmental documents. The reference cited, as well as others, will be utilized when a specific project area is known.

Response 28-9: The landslide areas of Bridger Formation and other units are included on Map A, part of which was derived from landslide maps supplied by the Geological Survey of Wyoming.

Response 28-10: A sentence will be added to text to add the information.

Response 28-11: You are correct. Footnote number 3 for Table 3-21 is in error, and it will be corrected.

Response 28-12: A sentence is added to text to add the information.

Responses 28-13 and 28-14: As described on page 32 of of the draft EIS, locatable minerals are not subject to the same management options as oil and gas and other leasables and salables. For example, "no surface occupancy" provisions are not applicable to locatables as they are for leasables. Because of the variable nature of locatable mineral development, each operation will be evaluated on a case-by-case basis at the time a notice or plan of operation is submitted.

Response 28-15: The text has been changed to reflect this fact.

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THE STATE OF WYOMING

MAY 23 1985

ED HERSCHLER
GOVERNOR

WYOMING RECREATION COMMISSION

122 WEST 25TH—HERSCHLER BLDG. CHEYENNE, WYOMING 82002

ALVIN F. EASTMON P.E.
Director
777-7686

May 21, 1985

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
122 W. 25th St.
Herschler Bldg.
Cheyenne, WY 82002

RE: 85-189

Dear Mr. Hartman:

The Wyoming Recreation Commission (WRC) received the Bureau of Land Management's Resource Management Plan and Draft Environmental Impact Statement for the Kemmerer Resource Area on April 24, 1985. Thank you for the opportunity to participate in this review process.

1 The WRC's primary concern with respect to the Resource Management Plan (RMP) is its treatment of outdoor recreation in general and the effect plan implementation would have on outdoor recreation opportunities within the resource area. Data from the 1985 Wyoming State Comprehensive Outdoor Recreation Plan Draft indicate a shortfall of many resource-based outdoor recreation opportunities already exists within the resource area. Since the vast majority of land within the resource area is administered by the BLM, the responsibility for providing adequate resource-oriented outdoor recreation opportunities for this region rests largely with the BLM. Unfortunately, this philosophy is not reflected in the RMP.

2 All the alternatives identified in this document are influenced to some degree by the assumption that continued low levels of funding for recreation management and development will persist. (In fact, this assumption is stated in the first planning criteria identified under Recreation Management on page 9 of the RMP). Operating under such an assumption, recreation management will, at the very best, be resigned to taking a back seat to other resource uses in the development of any alternative in the RMP. The BLM needs to recognize that outdoor recreation is an important

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JAMES A. WALLER, 1001 Sandstone Rd, Douglas 82633

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use of their lands and that the management of such use (as with any other resource use) requires a level of financial support. Recreation resources in the Kemmerer Resource Area are largely undeveloped and are currently threatened by energy development, grazing, access problems, overuse, and misuse. Integrating outdoor recreation with other multiple uses of the resource area presents a great challenge and will require a firm committment by the BLM. However, the incorporation of the assumption that no money is or will be available for recreation management or development into the RMP simply seems like a convenient excuse for not dealing with outdoor recreation issues. Granted, given the nature of the current administration such an assumption may be true, if only in the short term. However, if the RMP is to provide the guidelines for managing the Kemmerer Resource Area for the next 20 years, it needs to be more far-sighted and should consider a more comprehensive approach to recreation management by at least allowing for the possibility that funds for recreation management and development may become available in the future.

The possibility also exists that mitigation funds from large energy development projects within the resource area can be used towards recreation management and development. For example, the WRC has been working in conjunction with the Department of Geography and Recreation at the University of Wyoming on developing a comprehensive program for monitoring the impacts of energy development in southwest Wyoming on regional recreation resources. The results of the monitoring program will be used to develop specific mitigation recommendations for outdoor recreation resources in the region. As a major provider of outdoor recreation opportunities in this region, the BLM may be in a position of receiving some funds for mitigating outdoor recreation impacts. Such funds could help to partially off-set the present lack of federal funding available for recreation management. However, the BLM needs to work closely with the Wyoming Recreation Commission, the Wyoming Game and Fish Department and the Wyoming Industrial Siting Administration so that their concerns can be addressed in future mitigation negotiations.

3 The Recreation Potential Site Ratings described in Appendix H of the RMP indicate there are some important recreation resources within the Kemmerer Resource Area. The WRC would like to provide some additional information regarding the recreation potential of various sites within the region. The WRC recently conducted an inventory of potential recreation areas in Wyoming and although far from complete, several sites within the resource area have been identified as having a high recreation potential. The location of these sites is described in the following table:

Response 29-1: The KRA is currently being managed for dispersed use. It does not appear that this practice will change in the near future.

Response 29-2: Bureau-wide recreation funding policies prioritize funding allocations among states, with areas that receive high ORV use (California Desert, Nevada, Utah, and Arizona) receiving the largest share and areas that manage for dispersed use receiving the smallest share, hence, KRA's recreation budget has typically been small. The outlook for recreation management and development funding in the future appears to remain about the same.

The program regarding mitigation funds for recreation from large energy developments was undertaken after the draft EIS was written. The use of funds from other sources will be coordinated with State and local governments.

Response 29-3: Your listing of high recreation potential breaks down in the following manner: Sections 7 and 8 of T. 23 N., R. 111 W. fall under the jurisdiction of the Bureau of Reclamation and the Big Sandy Resource Area. Sections 11 and 14 of T. 23 N., R. 117 W. are private land. Section 5 of T. 26 N., R. 19 W. are already managed and mentioned in the Raymond Mountain WSA high potential rating in the RMP. Sections 10, 14, and 22 of T. 12 N., R. 117 W. are already mentioned in the RMP under Meeks Cabin high recreation potential site rating, but not for development because of two existing underutilized campgrounds. Parts of sections 10, 14, and 22 are managed by the Forest Service. Sections 11 and 15 of T. 12 N., R. 117 W. are private land or managed by the Forest Service. Sections 16 and 36 of T. 12 N., R. 117 W. are state land.

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Mr. Dick Hartman
May 21, 1985
Page 3

Township	Range	Section	Township	Range	Section
Lincoln County			Uinta County		
23	111	8	12	117	10
23	111	7	12	117	11
23	117	11	12	117	14
23	117	14	12	117	15
26	119	5	12	117	16
			12	117	22
			13	117	36

With the above concerns in mind, the WRC would favor Alternative C since it would afford a greater degree of protection for visual and recreation resources than any other identified alternative. However, the WRC would not oppose Alternative E if it was modified to include those recreational developments identified under Alternative C.

If you have any questions regarding this review, please feel free to contact this office.

Sincerely,

For: Alvin F. Bastron, P.E.
Director

By: Clifford E. Mikesell
Deputy Director

AFB/CM/MF/lr

30

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

MAY 20 1985

Public Service Commission

HERSCHLER BUILDING
122 W. 25TH STREET CHEYENNE, WYOMING 82002

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DIRECTOR, RATE AND TARIFF

May 20, 1985

Mr. Dick Hartman
State Planning Coordinator
Wyoming State Clearinghouse
2320 Capitol Avenue
Cheyenne, WY 82002

RE: State Identifier Number 85-189

Dear Mr. Hartman:

Enclosed are the Public Service Commission staff's comments regarding the "Kemmerer Resource Management Plan." Also enclosed is your department's referral completed as requested.

Sincerely,

Robert A. Larsen
Lead Electrical Engineer

RAL:cap
Enclosure

Response 30-1: One purpose of an RMP is to identify the restrictions and time requirements so that the companies are aware of these areas of concern and can therefore take these areas into consideration prior to filing an application. As stated on page 88, paragraph 7, seasonal stipulations would be considered on a case-by-case basis, meaning that we may require a critical, seasonal use area to be avoided during the critical time of year. For example, in planning construction schedules, utilities could build in the summer but they may not be allowed to construct during calving periods.

As requested in 43 CFR 2800 regulations, pre-application meetings are encouraged to reduce the amount of time involved in processing rights-of-way. These meetings, if held early in the design stage of a powerline project, will help the industry plan construction timing, avoiding critical times or areas before they get into the "ready to build" stage and find out they must reroute.

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MEMORANDUM

TO: JON E. JACQUOT, Chief Engineer

FROM: Robert A. Larsen, Lead Electrical Engineer RAL

DATE: May 3, 1985

SUBJECT: Kemmerer Resource Management Plan Draft Environmental Impact Statement by BLM.

The plan has five alternatives. The alternatives are:

1. Reduce restrictions on oil and gas development.
2. Emphasize livestock grazing.
3. Emphasize protection of wildlife and watershed. Restrict oil and gas development.
4. Reduce livestock grazing.
5. Multiple use planning.

The procedure and policy for obtaining rights-of-way for all five alternatives are basically the same as the present policy as modified slightly to be consistent with the alternative. Alternate 2 could have a major cost impact on rights-of-way because it requires secondary seeding of right-of-way for livestock grazing.

Our area of concern now is the length of time required for utilities
1 to obtain rights-of-way from the BLM. The Wyoming Public Service Commission cannot proceed with utility construction request approvals until receipt of BLM rights-of-way for the utilities. This plan identifies problem areas where there is critical erosion, elk deer, antelope, and moose wintering and calving, sheep lambing, raptor roosting, and sage grouse lek centers. Rights-of-way are and will continue to be routed around these critical areas. By focusing on these areas, this plan will require more re-routing and even longer periods of time for utilities to obtain rights-of-way.

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If special precautions are not adopted into this plan, the now intolerable length of time for receipt of rights-of-way will be made even longer.

31

THE STATE OF WYOMING

ED HERSCHLER
GOVERNOR

Game and Fish Department

CHEYENNE, WYOMING 82002

W. DONALD DEXTER
DIRECTOR

June 25, 1985

EIS 201/L2
USDI/BLM-Rock Springs
District-Kemmerer RA
RMP/DEIS

Mr. Dick Hartman
State Planning Coordinator
Herschler Bldg.
Cheyenne, WY 82002

Attention: Mr. Paul Cleary

Dear Mr. Hartman:

In response to your notification, EIN 85-189, we have reviewed this Resource Area Management Plan and the DEIS and offer the following comments to be used by the BLM in making the EIS more accurate and complete in considering the wildlife resource and in adopting suitable alternatives for managing the area.

General Comments

We support and recommend adoption of Alternative C, the "Wildlife" alternative. It would provide the most stringent guidelines and protection for wildlife. It is, however, more likely that BLM will adopt the preferred alternative - Alternative E. We do not oppose this alternative. We would recommend stricter "no surface occupancy" and "no leasing" restrictions, and would prefer the reclamation requirements for oil and gas activity listed under Alternative C be substituted in the BLM-preferred alternative.

We also believe the Livestock Management section of Alternative E should be replaced with the Livestock Management section from Alternative C. This is justified for the following reasons:

(1) the habitat condition of the riparian areas is generally considered poor, primarily due to livestock grazing.

(2) many of the streams have a declining habitat trend, due to the poor habitat condition of the associated riparian areas.

The adoption of the Livestock Management section of Alternative C would be a start in the stream-riparian habitat rehabilitation process. The re-establishment of 200 acres of riparian shrub vegetation in the Thomas Fork drainage and stream habitat improvement practices should only be considered a beginning on the extensive improvements needed for these vital fish and wildlife habitat areas.

31

Mr. Dick Hartman
June 25, 1985
Page 2 - EIS 201/L2.

The northwest corner of the Kemmerer Resource Area has the majority of the remaining Bonneville cutthroat trout habitat in Wyoming. This cutthroat trout subspecies is being considered for Threatened status by the U.S. Fish and Wildlife Service. Any further destruction of habitats utilized by this subspecies would certainly contribute to a Threatened or possibly even Endangered status. We recommend an increased inventory and monitoring program be implemented to assume compliance with stipulations of the resource area plan. Rapid identification of adverse impacts is extremely important if further resource degradation is to be minimized or eliminated.

A standard stipulation regarding vegetation manipulation, logging, range improvements, fencing, etc. should be included. Because of the magnitude of projects proposed, especially 82,600 acres of burning and 92 miles of fencing, we cannot at this time adequately review and assess specific impacts to wildlife. This, however, does not imply tacit agreement to all these projects. We request the right to comment on these projects as they develop.

Specific Comments

1 1. Pg.9, BLM Planning - Some clarification is needed - are all Management Framework Plans no longer in effect?

2 2. Pg.11, No Oil & Gas Leasing - The justification presented for eliminating Alternative #1 from detailed study appears to us to be misleading. Even though most of the KRA is currently under lease, these leases are issued and reissued as they expire. Prohibiting new leases in crucial wildlife areas could be feasible and have a substantial beneficial effect on wildlife. We feel this alternative is reasonable and recommend it be retained in the final EIS.

3 3. Pg.11, "No Surface Occupancy" restriction - We do not feel the rationale given for excluding this option is justified. A restriction of "no surface occupancy" is reasonable in critical wildlife areas where development will cause irreplaceable damage to this valuable public resource. Additionally, directional drilling can sometimes be used to avoid or lessen wildlife impacts.

4. Pg.34 & 35, Fish & Wildlife Habitat - We support the BLM intention to ensure all new fences be built to allow wildlife passage. Fence designs should correspond to guidelines cooperatively developed and outlined in both the G&F and BLM manuals.

We also appreciate BLM intention to consult the G&F prior to vegetative manipulation projects. Although not stated in the Forestry Section, since logging is also vegetative manipulation, we assume this same coordination will be extended to logging.

Response 31-1: Once this RMP is approved, management framework plans will no longer be in effect.

Response 31-2: See Response 10-4.

Response 31-3: See Response 10-4.

Response 31-4: See Response 20-2.

Response 31-5: See Response 10-14.

Response 31-6: See Response 10-15.

Response 31-7: The dates have been corrected.

Response 31-8: See revised text in the Proposed Plan.

Response 31-9: Logging activities will provide for the protection of riparian areas, and structures will be required for crossing perennial streams. During development of timber harvest proposals, an adequate buffer strip will be left around live streams to prevent water quality degradation.

Response 31-10: The December 1 to May 15 dates only apply to those areas that will not be allowed an exception to the winter range stipulation. However, the text has been changed to reflect preferred dates.

Response 31-11: See Response 19-5.

Response 31-12: See Response 10-23.

Response 31-13: The restrictions for oil and gas development and geophysical operations are different because the nature of the impacts is different.

Response 31-14: See Response 10-25.

Response 31-15: Both the Slate Creek and Rock Creek winter elk ranges will be closed to snowmachine activity on a seasonal basis as needed.

Response 31-16: These changes will be made in the final EIS.

Response 31-17: The paragraph gave several areas as examples. The crucial winter ranges on the west side of the Bear River Divide are another example.

Response 31-18: Your observation is correct. The text revision has been made.

Response 31-19: The 10 percent threshold has been dropped from the Proposed Plan.

Response 31-20: Our primary objective in the analysis was to provide general conclusions on the relative impacts of the various multiple uses on wildlife habitat. Important species or groups of species were highlighted whenever possible. For example, the impacts of various proposals on raptors was mentioned in several areas. Without

31

Mr. Dick Hartman
June 25, 1985
Page 3 - EIS 201/L2.

4 5. Pg.35, Riparian and Wetlands - The plan proposes direct action on 200 acres for active management to re-establish riparian shrubs, and at the same time identifies most of the Kemmerer Resource Area as having declining riparian vegetation. We recommend that BLM consider initiating similar projects in other areas such as Slate Creek and the Raymond Mountain area.

6. Pg.36, Rock Creek HMP - We do not have a copy of this plan in this office, but appreciate the coordination effort indicated.

7. Pg.36, Inventory & Monitoring - Since the G&F Department has jurisdiction over wildlife populations and BLM over the habitat, we would like to participate in monitoring.

5 8. Pg.37, Raymond Mountain - We favor the plan to develop a RAMP for the Raymond Mountain area. We recommend that there be no new road construction and the area be managed for back country recreational use.

6 9. Pg.40, Forestry Resources - BLM's practice of monitoring regeneration and planting seedlings in clear cuts only if adequate natural regeneration has not occurred after 15 years often results in inadequate hiding cover for elk for more than 30 years in some problem areas. We recommend planting seedlings after three years in clear cuts with inadequate natural regeneration.

7 10. Pg.51, Oil & Gas (Issue 2) - There appears to be a printing error in the elk calving area seasonal restriction. Based on other material throughout the text, it should read, "activity allowed from June 30 to May 15.

11. Pg.54, Fish & Wildlife Habitat - In the south Bear River Divide area, oil and gas fields are not confined to deer summer range. Critical mule deer winter range has significant oil and gas development in the Whitney Canyon and Woodruff Narrows fields.

ALTERNATIVE A:

8 12. Pg.65, Vegetation Manipulation - We are unsure what is meant by the statement "unless specific allotment objectives are to be achieved." The implication as worded could mean that manipulation should proceed if a livestock objective could only be met by adversely altering wildlife habitat. Clarification would be appreciated.

9 13. Pg.66, Fish & Wildlife Habitat - There is no rationale presented to explain why logging and clear cutting should always be allowed in riparian areas. We suggest this statement be modified to consider other values.

31

Mr. Dick Hartman
June 25, 1985
Page 4 - EIS 201/L2.

The Overthrust HMP should not be disregarded. In point of fact, its development would take on greater importance. The HMP is designed to coordinate and mitigate oil and gas disturbances.

ALTERNATIVE C:

10 14. Pg.75, 83 Big Game Winter range - Loss of habitat to geophysical exploration and oil and gas development must be minimized. Geophysical exploration should not be allowed from 11/5 - 5/1 instead of 12/1 - 5/15 as proposed. After 5/1, provisions for muddy area stipulations and elk calving will provide adequate protection.

15. Pg.75, Riparian Areas, Geophysical Exploration, Alternative C - We recommend the substitution of this subsection for the same subsection listed under Alternative E. We feel increased erosion of streambanks and degradation of riparian areas is contrary to management objectives.

11 16. Pg.75, Sage Grouse - This alternative, which should favor wildlife, has less restrictive stipulations for strutting grounds and nesting habitat disturbance than in the existing management situation. Is there some rationale for this?

17. Pg.78, Vegetation Manipulation - Vegetation manipulation restrictions around sage grouse leks should be extended a greater distance than 1/4 mile. Caution needs to be exercised regarding sagebrush burning in nesting areas. Nesting occurs in the vicinity of leks, especially if the suitable denser sagebrush stands are present. These sites are typically preferred sites for prescribed burning. We would be glad to assist in site-specific projects.

ALTERNATIVE D:

18. Pg.81, Reclamation - The fact that livestock grazing would be removed from public lands would increase the need for proper management of wildlife habitat, not diminish it. Reclamation should be directed toward maximizing productive wildlife habitat.

12 19. Pg.84, Hunting Areas - We receive numerous complaints from the public regarding seismic activity during the hunting season on lands surrounding the Wasatch National Forest, even though USFS restricts this activity at that time. Although there is no solid block of BLM land surrounding the National Forest, an area with this same restriction would be desirable.

completing a species by species analysis for non-game, the overall impacts would be difficult to generalize. What's good for one species may not be for another. In addition, our data base for some non-game species, such as raptors and prairie dogs, is incomplete.

Response 31-21: If an allotment responds to management and additional forage becomes permanently available, this increase would be apportioned to wildlife, watershed, or livestock to satisfy allotment objectives. No increase in productivity would be deemed permanently available unless riparian habitats had been restored and stabilized.

Response 31-22: The enhancement of waterfowl habitat is a primary goal in the KRA. Projects have been completed in Thomas Fork drainage and Skull Point reservoir to improve wetland habitat. Additional wetland surveys will be completed as funds are available.

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Mr. Dick Hartman
June 25, 1985
Page 5 - EIS 201/L2.

13 20. Pg.84, Riparian Areas - Restrictions on geophysical exploration in riparian areas should be the same as those for oil and gas development - no activity within 500 feet of riparian areas to minimize surface damage.

14 21. Pg.84, Riparian - We support establishing a maximum utilization level of 60% of riparian grasses in "I" allotments (Alt. 3 pg. 204) and encourage the BLM adopt monitoring and enforcement of this requirement. However, on page 204, it is stated that this level is the maximum allowable to prevent riparian area decline. In view of this, we suggest establishing maximum limits at a lower level to promote re-establishment and rejuvenation of these areas.

15 22. Pg.87, Fish & Wildlife Habitat - We support the provision for closing the Slate Creek and Rock Creek winter ranges when needed. There seems to be a contradiction in definition of actions to be taken between this section and ORV (pg. 88). The ORV section states the Rock Creek area will be closed.

We suggest BLM implement an annual closure on both the Rock Creek and Slate Creek winter ranges to snow machine activity. This will help reduce disturbances from winter recreational activities.

23. Pg.88, Rights-of-way - We ask that this Department be consulted in the decision to waive seasonal restrictions on crucial habitat.

CHAPTER III AFFECTED ENVIRONMENT

16 24. Pg.123, Table 3-13 - The herd objective given for Cedar Mountain extends to areas beyond Kemmerer RA. This needs to be adjusted.

The GAP is proposing the following changes in herd objectives. These objectives have not been approved at this writing, but should be by the time the FEIS is completed.

ANTELOPE	Cedar Mountain	5,500
MULE DEER	Carter Lease	8,500
	Uinta-Cedar Mtn.	7,000
	Wyoming Range	45,000
ELK	Uinta-Cedar Mtn.	600
	West Green River	3,000
	Carter Lease	50
MOOSE	Carter Lease	120
	Lincoln	1,000

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Mr. Dick Hartman
June 25, 1985
Page 6 - EIS 201/L2.

25. Pg.122, Mule Deer - The west side of the Bear River Divide and the LeRoy area are extremely important winter ranges. In square mile densities, these two probably support more deer than Slate Creek.

26. Pg.125, Whooping Crane - Cranes have been identified as summer residents in the Ham's Fork drainage, Fontenelle and Bear River drainages. These same birds may establish territories and subsequently nest in these areas.

CHAPTER IV ENVIRONMENTAL CONSEQUENCES

17 27. Pg.161, (1st para.) Fish & Wildlife Habitat - There is no identification of oil/gas development on crucial winter ranges along the west side of the Bear River Divide.

18 28. Pg.181 & 182, Irreversible & Irretrievable Commitment of Resources Through Conclusion - This section seems to be displaced. The section discusses livestock rather than wildlife.

19 29. Pg.200, Geology and Minerals, 2nd column, 3rd paragraph - We strongly recommend the 10% threshold for mitigation be dropped. No reduction of important habitat should occur without adequate mitigation.

Other General Comments

1. Fencing should be considered a tool for protecting riparian areas from continued overgrazing.

2. The idea of the 10% threshold level for crucial habitat mitigation is unacceptable, and may be contrary to the Fish and Wildlife Coordination Act in certain instances. This Department has always opposed any action which results in the loss of any crucial habitat, unless adequate mitigation is provided.

20 3. Nongame habitat management needs to be more fully addressed under the various alternatives. On page 125 it is stated that "the riparian and conifer/aspen communities are the most important habitat types in the KRA for supporting the greatest variety and abundance of wildlife. What are the potential impacts to nongame animals/birds under the various alternatives, in particular on the important riparian and conifer/aspen communities?

21 4. At present, BLM does not include riparian areas in range surveys. As these areas are critical for both livestock and wildlife management, we recommend more attention be directed to these areas.

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Mr. Dick Hartman
June 25, 1985
Page 7 - EIS 201/L2.

5. We support grazing management on "I" category allotments that would improve current condition of riparian areas. All allotments with large amounts of riparian areas on public land should not have AUM's increased for livestock until erosion is checked and stream bank vegetation rejuvenated. Pages 120 and 121 identify drainages with accelerated stream bank erosion and lowered water tables and an overall decrease in riparian vegetation.

We would like to see more projects initiated to alleviate this problem. Where over-grazing and shrub control has been identified as the cause, grazing fee monies could be used to fund these projects, as it would benefit both livestock and wildlife.

22 6. Waterfowl habitat management needs to be more fully addressed. Actual or potential waterfowl habitat utilization exists in the KMA. Waterfowl hunting, photography, etc. presently provides recreation and potential exists for greater participation in these forms of recreation. On page 123 it is indicated that in 1980, 300,000 acres between Kemmerer and Evanston were identified as waterfowl habitat. The survey identified 299 ponds on public land that have waterfowl potential. We suggest consideration be given to actions that maintain or enhance waterfowl habitat, and that remaining waterfowl habitat be identified. We would be happy to assist in this effort.

Please forward these comments to the appropriate BLM authorities and contact this office if we may be of further help.

Sincerely,

FRANCIS PETERA
ASSISTANT DIRECTOR
OPERATIONS

FP:KRM:sec
cc: Game Div.
Fish Div.
NATS Div.

32

United States Department of Agriculture | Forest Service | Wasatch National Forest | Mountain View Ranger District, P.O. Box 129, Mountain View, Wyoming 82939

July 5, 1985

Ron Winker, Area Manager
Kemmerer Resource Area
Bureau of Land Management

Dear Ron:

My staff and I have reviewed your Draft Kemmerer Resource Management Plan and EIS and would like to commend you and your people for a job well done. I was especially impressed with the range and vegetative sections.

We do have a few comments for your consideration that may help to strengthen your plan. We will restrict our comments to that portion of your area that that lies South of Interstate Highway 80 because that is the area we are personally acquainted.

Wildlife:

1 Antelope herd unit 99 is possibly one if not the fastest growing population of antelope in the state. Antelope from herd Units 94 and 95 migrated into this area during the heavy snows of the 1983-84 winter and were constrained by fences the following spring. Critical antelope winter range between Mountain View and Lonetree were being heavily used prior to the 83/84 winter and with additional animals this is worthy of consideration.

Moose herd 27/35 is not only an important Wyoming herd, but winters a large part of the State of Utahs largest and most important moose herd.

The North Slope interstate elk herd is of considerable importance to the State of Utah and portions of that herd does depend on lands within your jurisdiction for winter range.

Minerals:

2 My minerals department noted that we are handling minerals restrictions different than you are for basically the same area. I am not saying we are right or wrong, but that it must be confusing to the public and mineral industry. Bob Odden is my minerals person and if you feel that further follow up on coordination is needed in minerals please contact him.

Continued Page 2

Response 32-1: Thank you for providing additional information on wildlife ranges near the Forest. Your comment will be considered during our coordination efforts with the Wyoming Game and Fish Department.

Response 32-2: The identification of crucial big game winter ranges and elk calving areas are primarily the responsibility of the Wyoming Game and Fish Department, with input from the BLM.

Response 32-3: Geophysical exploration will be restricted during the mule deer and elk rifle seasons on lands adjacent to the Wasatch National Forest.

Response 32-4: Minimizing the disturbance of riparian areas is a general theme throughout the alternatives. Under Alternative E, geophysical exploration crossings of perennial streams would be minimized and use of established roads, temporary bridges, or portable operations are preferred. For oil and gas development, and logging activities, bridges or culverts are recommended on all perennial stream crossings.

Response 32-5: Under the Proposed Plan, fencing is not required on all locations but will be used as a measure to protect reclamation efforts where the Authorized Officer deems it necessary. For example, fencing may not be needed where

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Ron Winker---Page 2

Areas of Concern are:

Page 12---Maps do not indicate critical winter ranges for big game, hence seismic and drilling are curtailed on the National Forest but not on the BLM.

Page 12---We have the same problem with elk calving areas as with winter range.

Page 13---We restrict seismic activity during big game rifle seasons. The companies cross the fence and continue their activities on your lands.

3 Page 17--Alt. E---We allow road crossing of riparian areas at a right angle where no alternative can be found. Possibly you would like to consider such an exception.

4 Page 20--- We vary from your alternative of no fencing of locations. We with few exceptions, require all locations to be fenced. The obvious reason is to keep livestock, wildlife, etc. out, but I feel even more important is to keep the industry people in. Without a fence the location, truck parking, etc. has a tendency to expand.

5 Page 45---We do not use a Notice of Intent for Geophysic operations. We use a permit system and feel that it gives us considerably more control.

6 Page 45---We feel that this area (South of I-80) is not adequately covered for big game winter range or elk calving.

Page 46---Same comments as on page 13 about hunting dates and locations on restrictions.

Map 4 after Page 46---May be desirable to change this map to conform with Forest SErvice policy.

Page 57--- Dates of calving and winter range.

Lands:

7 The following description of land adjustments is what we have in our Forest Plan. This is according to proposal that Don Sweep made the last time that Art Carroll, Don Sweep, you and I met in my office.

Continued Page 3------

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Ron Winker--Page 3

LAND ADJUSTMENT

8 J13 Achieve the land ownership best suited to

J15 managing Forest resources.

J16 Pursue the opportunity to transfer identified BLM lands adjacent to the National Forest between the Meeks Cabin Reservoir area and Hickey Mountain.

STANDARDS AND GUIDELINES

(S) Cooperate with Bureau of Land Management to transfer administration of those BLM lands that are more feasibly managed by the Wasatch-Cache National Forest from the BLM to USFS. The BLM land within the following description: starting at the point where BLM land and National Forest land join on Hickey Mountain, follow the Hickey Mountain ridge northeast to Lonetree road, Wyoming 414, thence north on this road to Mountain View. Thence follow the Robertson Road, Wyoming 410 south and west to Jones Creek. Thence follow unimproved road southwest 1½ miles to state Section 36, thence south one mile to SE corner of Section 36, thence west six miles to SE corner of Section 36, T14N, R117W, thence south to stateline, thence east along the state line and national forest boundary to point of beginning.

Ron, I feel that you have done an excellent job on your plan. I am thankful for the opportunity to review it and to add our suggestions. I hope you receive them as suggestions and not as criticism.

Sincerely yours,

RODERICK R. HOWARD
District Forest Ranger

P.S. Jerry Carnes comments are enclosed.

expected grazing pressure is minimal, however, fencing may be required where a disturbance is near water developments or bedding grounds.

Response 32-6: BLM procedures do not provide for a permit system for geophysical operations.

Response 32-7: See Response 32-3.

Response 32-8: The Proposed Plan has been modified to be consistent with the Wasatch-Cache Forest Land Management Plan. Pending the outcome of the current BLM/USFS interchange effort, the BLM will pursue the opportunity to enter into an Interagency Agreement with the Wasatch-Cache National Forest to manage the public lands specified in the Proposed Plan (see Land Tenure Adjustment).

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United States Department of Agriculture | Forest Service | Evanston Ranger District Wasatch-Cache National Forest

Reply to: 1920 - Land and Resource Management Planning

Date: July 3, 1985

Subject: Kemmerer Resource Management Plan Draft Environmental Impact Statement

To: Rod Howard, District Forest Ranger:

Following are our comments on the Kemmerer Resource Management Plan Draft Environmental Impact Statement, Please add to your reply as we discussed on the phone:

1 1. All the maps show the area around Meeks Cabin Reservoir as under BLM administration. The administration of the "Take Line" around the Meeks Cabin Reservoir is under Forest Service jurisdiction. To prevent confusion to the general public this should show as National Forest. (See attached map.)

2 2. The major area identified as timber base is the area around Meeks Cabin Dam. We are concerned that any logging done in this area consider the visual impacts as viewed from the Meeks Cabin Reservoir, campground and Blacks Fork Road.

3 3. I could not find any reference to the proposed cooperative agreement between the BLM and Forest Service to manage the BLM land south of Mountain View by the Forest Service.

Jerry E. Green

JERRY E. GREEN
District Forest Ranger

cc: S.O.

Received Wasatch NF
Mountain View RD
JUL - 3 '85

	ACT	INFO
Ranger		
Clerk		
Hoogt		
Egmont		
1st Forester		
Forester		
Forester		
Range Con		
Biologist		
GSA		

Response 33-1: Our Map C which shows land status was printed incorrectly showing land status around the Meeks Cabin reservoir. This map will be corrected.

Response 33-2: The area in view of the Meeks Cabin Dam is in Visual Class III which states that "changes in any of the basic elements (form, line, color, texture) caused by a management activity should not be evident in the characteristic landscape."

Response 33-3: See Response 32-8.

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Lincoln Conservation District
P.O. Box 98 - Room 1, Cokeville Town Hall - Cokeville, Wyoming 83114

July 10, 1985

Ron Wenker, Area BLM Manager
Bureau of Land Management
Kemmerer, WY 83101

Dear Ron:

After discussing the proposed Kemmerer Area Resource Management Plan and Draft Environmental Impact Statement prepared by the BLM with you and Dave Henderson at our June board meeting, we, as a Board of Supervisors, would like to point out some items of concern that appear not to be addressed in the document as far as we read.

1 1. Concerning the Fish and Wildlife Habitat Issue it is of deep concern to us as a board that large upland game numbers such as antelope, deer, and elk are allowed to expand uncontrolably on federal lands without emphasis on critical winter habitat's ability to support them. When wildlife numbers exceed winter habitat's carrying capacity local haystacks are destroyed and the existing winter range is severely damaged, causing even less winter habitat the next year. Care needs to be taken in the future that local input is given especially from agriculture producers when game numbers are being made on federal lands. No supervisor present had ever been contacted concerning this matter by the BLM or the Wyoming Game and Fish Department.

2 2. It is also of deep concern to us as a board that in your Livestock Management Issue little was mentioned about the need to control livestock movement, especially sheep on stock trails. A lot of rangeland is damaged by trespass when sheep bands traveling back and forth from winter to summer ranges are not strictly confined to established stock trails. It is our suggestion that a range rider position be established by the local BLM office to control this problem. This individual would be responsible to keep track of herd movements on a daily basis making sure no trespass occurs, or fines would be assessed that hurt. This would greatly improve overall rangeland vigor and condition on allotments near stocktrails.

3. Concerning your proposed priority system to revise allotment management plans. The priority system appears to be okay. We would request although that you use a coordinated planning approach when possible, involving all those with local interest and expertise in the proposed plan. This will help eliminate local misunderstandings and confusion.

We appreciate you and Dave coming to our board meeting and discussing your objectives on BLM land in the Lincoln Conservation District. We feel the BLM's preferred alternative E to be basically fair for the land area in question, if the above items discussed in this letter are addressed properly.

Sincerely

Virgil Bailey

Virgil Bailey, Chairman

CONSERVATION DEVELOPMENT SELF GOVERNMENT

Response 34-1: Wildlife objective numbers are set by the Wyoming Game and Fish Department. BLM provides information and recommendations during that process.

Response 34-2: We recognize the need for better control of sheep trailing. However, considering current and proposed budgets, we have little hope of obtaining a range rider. We intend to continue working with all parties involved to ensure compliance with trailing stipulations and will maintain as high a field visibility as possible during the trailing periods.

35

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

2120 Capitol Avenue, Room 7010
Cheyenne, Wyoming 82001

IN REPLY REFER TO:

July 12, 1985

Memorandum

To: Area Manager, Bureau of Land Management, Kemmerer Resource Area, P.O. Box 632, Kemmerer, Wyoming 83101

From: Project Leader, Ecological Service

Subject: Review of Kemmerer Resource Management Plan Draft Environmental Statement (DEIS)

We have reviewed the subject statement, and the following constitutes the comments of the U.S. Fish and Wildlife Service (FWS). Your staff deserves credit for a good job in preparing one of the better Resource Management Plans DEIS that we have reviewed.

1 The status of local oil and gas industries is important but protection of wildlife and aquatic resources should also be a primary consideration. Throughout the DEIS the adverse affect of energy development on natural resources, especially aquatic and riparian habits, is well documented. The DEIS indicates (page 143) "that the most important method for mitigating the impacts of oil and gas development involves reclamation. Reduction of slope and promotion of cover vegetation is of highest importance in minimizing soil erosion. Generally, on slopes of less than 15 percent, successful reclamation can be expected, with success rates dropping dramatically on steeper slopes." With these points in mind, we strongly recommend that all efforts be taken to limit development on slopes more than 15 percent and to promote timely reclamation of disturbed areas. We also recommend that seismic operations be restricted to dry and frozen periods to minimize vegetative cover loss and soil compaction. In addition, Alternative C contains many good protective wildlife measures that should be incorporated into the proposed action to ensure adequate protection of important resources from energy development. Pertaining to raptor protection, we recommend that the nests of the following nonendangered raptor species receive the following seasonal protection.

Golden eagle	February 15 - July 15
Osprey	April 15 - August 15
Prairie falcon	March 15 - August 1
Merlin	April 25 - August 15
Ferruginous hawk	March 25 - July 15
Cooper's hawk	April 1 - August 15
Burrowing owl	April 15 - July 15
Swainson's hawk	April 1 - July 15
Goshawk	March 1 - July 31
Red-tailed hawk	April 1 - July 15

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2

Application of any raptor nest protective measures is dependent upon adequate inventories to identify potential conflicts before surface disturbing activities are permitted. If adequate inventories are not available, as is the case in many areas of the Resource Area, we highly recommend that your wildlife staff conduct an on-site inspection of the project area to ensure raptor nest protection. As a general guideline, we recommend that a three-quarter mile radius protective zone be maintained around each raptor nest. Smaller buffer zones could be designated on a site-by-site basis after consultation with your biologists and state and federal wildlife agency biologists. Topographic relief, vegetative density, or other circumstances may allow reduction of buffer zones in some situations.

2 A major concern to us is the existing condition of riparian and aquatic habitats in the Resource Area. The BLM 1975-76 stream habitat survey estimates that 73 percent of the fisheries habitat is in an apparent declining trend (page 121), and 64 percent of the riparian habitat is in poor condition. The DEIS indicates that much of this decline is due to livestock overgrazing and human activities within the riparian zone. As you know, the BLM has recognized the importance of riparian-wetland habitat, and special emphasis has been given to the protection and enhancement of these areas in terms of general policy. On February 5, 1980, the BLM published in the Federal Register (Volume 45, No., 28, pages 7889-7895), Final Guidelines; Wetlands-Riparian Area Protection and Management; Policy and Protection Procedures. Therein it is stated that, "Riparian areas which presently or potentially support broad-leaf vegetation in arid and semi-arid ecosystems are of special management concern" (emphasis added). One of the stated objectives is to implement a management system to protect, maintain, and enhance all wetland-riparian areas administered by BLM." The guidelines further state that BLM policy will be to "Avoid the long and short-term adverse impacts associated with the distribution, loss, or degradation of wetland-riparian areas". . . and "Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage." Having reviewed the DEIS, we do not believe that these guidelines will be fully met. We recommend that during preparation of the final EIS and selection of an alternative, more attention be given to wetland-riparian habitat needs and where protection is obviously needed, it not be held up until long-term monitoring is completed. In this regard, this office is willing to assist your staff in the development of site-specific plans to protect these important resources.

We strongly advocate the completion and implementation of Cumberland Wetlands, Kemmerer Riparian, Woodruff Narrows, Rock Creek and Thomas Fork Habitat Management Plans (HMP). We commend your agency for the special attention it is giving to the Thomas Fork area and your efforts to manage habitat for the Bonneville cutthroat trout. We also encourage the expeditious implementation of the Woodruff Narrows HMP in order to maintain and enhance this important riparian habitat that the endangered bald eagle is so dependent upon.

Response 35-1: The 15 percent figure on page 143 is a misprint and should read 25 percent (as indicated on Figure 4-1). Well sites, fields, and plant facilities will be restricted in the 25 to 40 percent slope areas. Development will be contingent on detailed engineering and reclamation plans that would minimize erosion, facilitate stability, and provide adequate revegetation. No surface occupancy includes slopes greater than 40 percent on a site-specific basis.

Every attempt will be made to ensure minimal damage to vegetation and soils during geophysical operations by restricting operations during wet or muddy conditions, and restricting surface disturbing activities caused by vehicles in steep terrain.

Response 35-2: Adverse impacts to wetland and riparian areas from mineral development activities have been presented in the RMP. The proposed management actions will be in effect immediately upon approval of the RMP. Specific actions to alleviate impacts from livestock grazing will follow the development of AMPs or monitoring plans. This does not imply that monitoring will always precede a management action. Some areas will receive management attention based on existing information. We are very much aware of our management responsibilities for wetland and riparian areas. This approach is reflected throughout the RMP.

Response 35-3: See Response 19-4. Management actions, i.e., grazing systems, herding, change in kind of stock, etc., will be implemented on each "I" category allotment. These actions will be directed towards, among other things, recovery and stabilization of riparian habitats. Monitoring programs will be implemented to measure the progress towards attainment of the desired objectives.

Response 35-4: We fully agree that riparian areas should not be allowed to deteriorate due to conversions in kind of livestock. No conversions from sheep to cattle will be allowed unless riparian issues are considered and a plan for management and monitoring is developed and implemented. The management actions and range improvements must be in place prior to authorizing the conversion.

Response 35-5: As stated in the draft RMP (page 37, last paragraph; page 38, first paragraph) all land tenure adjustment proposals must first meet criteria in FLPMA. If the proposals appear to meet the criteria in Section 203, 206, or 212 of FLPMA, then a detailed site-specific environmental document must be prepared. This document considers all of the legal authorities cited in your comment.

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3 To maintain livestock forage production at the proposed higher level, intense management will be required to protect riparian zones, wetlands, livestock forage production. We believe that the 60 percent riparian grass utilization level proposed under the preferred alternative is excessive. Hormay stated that 60 percent utilization approaches heavy grazing.[1] The DEIS indicates (page 190) that if grazing pressure is limited to a 40 percent utilization level that it would likely result in sustained improvement in riparian conditions over the long term. Therefore, we recommend that a utilization rate of 40 percent, as proposed under Alternative C, be the maximum allowable to maintain riparian systems in good condition without a declining trend. However, livestock access to riparian or streamside zones in fair to poor condition may still have to be restricted, especially in the Smith's Fork, Cumberland, and Slate Creek allotments to allow for woody vegetation recovery and maintenance.

With respect to streambank stability, water quality, and the timing of grazing in the riparian zone, recent research by BLM in Wyoming indicates that stream banks are most unstable when soil moisture is high, i.e., in the spring. Specifically, limiting cattle numbers in the riparian zone in the spring did not significantly reduce the total amount of bank slumping caused by cattle, and water quality was adversely affected. We suggest that cattle be kept away from streams with unstable banks during seasons when soil moisture is high until such time has elapsed that bank stability has been restored. We strongly recommend that sensitive areas be fenced to exclude cattle when the presence of cattle is shown to cause adverse impacts to water quality, stream bank stability and vegetation, as well as riparian shrubs and tree regeneration. We recommend that the concentration of livestock in riparian areas during moist seasons be prevented by fencing if necessary. In addition, plans for managing livestock during drought years should be developed with full consideration for riparian and aquatic zones.

4 The DEIS indicates that some conversion of grazing from sheep to cattle has resulted in declines in range conditions, especially in riparian areas, and this decline could be expected to continue. We have concerns with future livestock conversions and do not believe that just preparing a plan for riparian areas that presently have problems provides adequate safeguards. We strongly recommend that no conversion be allowed in any allotment that presently has range riparian problems unless the riparian areas are fenced. In no case should riparian areas be allowed to deteriorate due to the conversion. A plan should be developed for all conversions, and the plan be implemented (i.e., fences in place and additional water sources developed) prior to the conversion.

[1] A.L. Hormay, "Principles of Rest-rotation Grazing and Multiple-use Land Management," U.S. Department of the Interior, Bureau of Land Management, and U.S. Department of Agriculture, Forest Service Memorandum, 1970.

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4

We have serious concerns about your agency's plan to possibly dispose of 53,487 acres of public lands within the Kemmerer Resource Area. Scattered parcels of public land can provide sanctuaries for wildlife in
5 areas where private lands have been altered or severely impacted. Disposal of public lands may also severely impact the opportunity for outdoor recreation such as hunting and fishing. Scattered land parcels may seem to be difficult to manage; however, a policy of letting many of these parcels remain natural or revert to natural conditions may require minimal BLM management. In cases where it is truly in the best interest of the public and resources associated with the land to dispose of a tract, we recommend an equitable land exchange rather than outright land sales. Land sales and exchanges could also influence FWS programs. Currently, land exchanges are one of the best methods for FWS to acquire needed lands. We are particularly interested in riparian and wetland areas that now support or could be managed to support waterfowl and migratory birds. In cases where the property does not fit our program needs, BLM has the responsibility to ensure protection of wetlands and riparian areas when they are transferred to the private sector, as required by Section 203 of FLPMA, Executive Order 11990 and Bureau policy as set forth in BLM Manual 6740.06(a)(1). Some of the land identified for disposal in Appendix D contains such habitat types. Concerning the Star Valley land disposal plan (Map 7), should any public land be disposed of, we recommend they be transferred to the Forest Service (FS), especially stream areas in unit 8 and 9. Please keep this office abreast of plans to dispose or exchange any of the land in question.

6 Another area of concern is proposed brush and noxious weed control in the vicinity of streams, sage grouse strutting grounds, and on wildlife winter range. We recommend a two-mile buffer zone around sage grouse strutting grounds to protect nesting and brooding areas. In addition, no brush control work should be conducted on wildlife wintering areas without concurrence of Wyoming Game and Fish Department (WGFD). Woody riparian vegetation should also be protected for its high value for fish and wildlife. In riparian areas, we recommend against the use of persistent water soluble herbicides such as Tordon, and that noxious weeds be treated with selective tools, such as the wick applicator. The use of Tordon adjacent to streams with reproducing populations of trout should not be considered. Research conducted by Dan Woodward of the FWS Field Research Laboratory, Jackson, Wyoming indicates that Tordon is very toxic to young-of-the-year trout.

7 Coordination under provisions of Section 7 has not been completed between FS and BLM. Specific endangered species concerns or issues will be addressed by FWS at a later date through the consultation process. The Section 7 Endangered Species Act consultation should be included in the final EIS.

Thank you for the opportunity to comment on the DEIS.

Arthur Anderson

cc:
Assistant Regional Director, FWS, Denver, Colorado (HR)
Field Supervisor, FWS, Billings, Montana (ES)
State Director, BLM, Cheyenne, Wyoming
Director, WGFD, Cheyenne, Wyoming

As noted in the FLPMA sale criteria, Section 203(a)(1), "such tract because of its location . . . and is not suitable for management by another Federal department or agency; or. . . ." These lands identified by our RMP can be transferred to your agency's administration or retained by the BLM if they are found to contain values suitable for continued management, upon detailed site-specific analysis.

As stated on page 88, paragraph 3, Alternative E, we propose transferring those Star Valley parcels adjacent to the Forest Service boundary to them. Parcels 8 and 9 on Map 7, the Wyoming Game and Fish has shown interest in maintaining public access to the Salt River. Subject to a site-specific analysis, this may happen or the lands may remain in federal ownership.

Response 35-6: The available literature indicates that creating small openings in dense sagebrush one-quarter mile from sage grouse leks may enhance nesting habitat. By designing "brush control" projects to result in a mosaic pattern, we can restrict the size and distribution of these openings.

No specific sites for treatment have been chosen yet. However, we do recognize that some of these sites may occur within big game winter ranges. Treatments would occur in big game winter ranges only if benefits to the winter range could be derived. Livestock benefits would be secondary. Weed control is coordinated through the County Weed and Pest Control Department. It is BLM and county policy to use hand applied pellets or wick applicators for weed control in riparian areas. No spray or broadcast applicators are used on these sites.

Response 35-7: Based on the impact analysis in the draft EIS and an analysis of public comments, we do not believe there will be an adverse effect on any threatened and endangered species as a result of the decisions in the Proposed Plan. However, future site-specific proposals could result in a "may effect" situation for species in the resource area. All proposals will be analyzed on a site-specific basis when they are proposed and the Fish and Wildlife Service will be consulted, as appropriate. Consultation with the Fish and Wildlife Service on the Proposed Plan is underway and will be completed before the RMP is approved.

36

Amoco Production Company
Denver Region
Amoco Building
1670 Broadway
Denver, Colorado 80202
303 830-4274

Roberta Andersen
Public Lands Coordinator

July 12, 1985

Mr. Alan Stein
KRA Team Leader
Bureau of Land Management
P. O. Box 7869
Rock Springs, WY 82902-1869

Dear Mr. Stein:

Amoco Production Company is a subsidiary of Amoco Corp., formerly Standard Oil Company (Indiana). Its Denver Region is charged with exploring for and producing oil and gas throughout the Western United States. Our company has an extensive federal leasehold position throughout the West, and a continuing interest in the federal land planning process. We appreciate the opportunity to comment on the Kemmerer RA Plan.

We appreciate BLM's understanding of the need to formulate an alternative based on known high production values for hydrocarbons in the planning area, and we support Alternative A. The industry continues to develop its environmental protection and reclamation techniques. We strongly believe we can operate in areas which are environmentally sensitive with minimal disruption. Acknowledgment of hydrocarbon potential gives the land manager priority values against which to evaluate other management activities, and makes potential conflict resolution a more logical process.

We will be pleased to continue to work with RA personnel as to geologic favorability of various areas, and we appreciate the acknowledgment of the importance of the energy resources in the RMP.

Sincerely,

R. Andersen

RA:sd

37

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

JUL 12 1985

Ref: 8PM-EA

Alan Stein, Team Leader
Rock Springs District Office
Bureau of Land Management
Post Office Box 1869
Rock Springs, Wyoming 82902-1869

Re: Draft Kemmerer Resource Management Plan/Environmental Impact Statement

Dear Mr. Stein:

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency has reviewed the referenced document. The EPA appreciates the efforts invested in developing this long-range resource management proposal. As you are aware, BLM activities can relate to EPA's environmental mission in several different ways. Our comments reflect this mission by addressing a substantial range of concerns related to management of water, air, riparian/wetland areas, soils, and vegetation resources. Since the RMP will provide a broad planning framework without detailed, site-specific environmental analyses, many of our concerns relate to planning guidance and policies. However, we have also identified concerns regarding alternatives and impact analysis.

We believe that Alternative C is preferrable to Alternative E (BLM's preferred alternative) in several respects, including its assertive approach to watershed, riparian and vegetation management, and erosion control. We have also identified concerns which prevented the level of alternatives analysis that we felt was necessary. There is a need for more specific direction and guidance dealing with such resource concerns as stream habitat and fisheries, ground water, air quality, erosion control and nonpoint source control best management practices (BMPs), water quality standards compliance, watershed planning, and monitoring. We did not feel that BLM management activities for addressing identified water quality problems in the Bear and Green Rivers, Bear Lake, and Flaming Gorge Reservoir were defined adequately. We have recommended improvements in environmental impact disclosure, primarily in relation to water quality and watershed, rangeland ecosystem, and fishery resources.

We recommend that the RMP/EIS reflect a stronger correlation of management direction to certain Federal Land Policy and Management Act of 1976 (FLMPA) mandates, in particular: the environmental protection requirements of Section 102(a)(8); the multiple-use/sustained yield requirements of Section 202(c)(1); and the rangeland resource goals of Section 401(b)(1). We found it difficult to determine what these requirements mean in terms of actual on-the-ground management by alternative.

Response 37-1: Municipal water for towns in the KRA comes from major rivers, wells, and reservoirs. Kemmerer and Cokeville get their water from the Hams Fork and Smith Fork River, respectively. Evanston uses water from the Sulfer Creek Reservoir.

The use of best management practices to reduce erosion and sedimentation as much as possible is one of the techniques used to ensure that downstream uses are not adversely impacted.

Response 37-2: The broad narrative in the conclusion statement was not intended to stand by itself. The preceeding narrative under Water Resources supports the conclusion.

Response 37-3: See Response 4-4.

Response 37-4: Alternative C would result in the elimination of debris and high sediment carrying runoff velocities caused by, or accelerated by man's activities.

Response 37-5: Alternatives, development avoidance and watershed enhancement and protection will be prioritized and formulated in areas of identified critical erosion condition. To facilitate coordination of objectives and methods, watershed management plans (WMPs) will be

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A very important consideration is the scheduling and funding priority for various high priority resource protection and rehabilitation needs identified in the RMP. We suggest that BLM (in the RMP) briefly describe the scheduling and funding process that will be used to address these high priority needs.

We feel that there will be a continuing need for public and other agency involvement in planning some of the projects to be done under the broad RMP framework. The process and opportunity for this involvement should be established in more detail in the RMP.

Based on our concerns and the criteria EPA has established to rate adequacy of draft EISs, we have rated this draft EIS as Category EC-2 (environmental concerns-insufficient information). The EPA review has identified several environmental concerns regarding the BLM's preferred alternative, and additional corrective measures, data, analysis, and discussion that should be included in the proposed RMP and Final EIS. If further EPA assistance is needed, please feel free to contact Doug Lofstedt of my staff at 303-293-1717 or FTS 564-1717.

Sincerely,

Dale Vodehnal, Chief
Environmental Assessment Branch

Enclosure

cc: Hillary Oden, Wyoming BLM State Director
Robert E. Sundin, Director, Wyoming Department of Environmental Quality
William Dickerson, A-104 (OFA)

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EPA COMMENTS ON BLM DRAFT KEMMERER RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

Water Quality/Quantity, Soils, and Watershed

1 We would like to see the discussion of water quality on pages 111-112 describe the existing state water quality standards in more detail. This should include designated beneficial uses and use protection criteria, and existing impairments to these standards. We suggest that a matrix be used to display this information.

2 The alternatives analysis should disclose potential impacts in more detail. For example, the RMP states that Alternative C would result in "very little damage" to water resources (page 107) and it would be "most beneficial to water resources" (page 188). Similar statements are on Summary page 8 and in the analysis of water resource impacts under the preferred alternative on page 202. As another example on page 202, what does the following concluding statement mean?

> "Most actions, causing adverse impacts to water resources, could probably be offset with a mitigation measure which would be compatible, with most resources."

Such broad statements do not adequately describe the water resource impacts. Without more specific information, compliance with water quality standards, which the draft RMP/EIS states on page 35 would be accomplished, is unclear. In a related point, the RMP/EIS should address the consistency of BLM activities with EPA's current water quality standards regulation (40 CFR Part 131) which does not allow the state to remove a designated use if, 1) the use is existing (unless a use requiring more stringent criteria is added), or 2) if the designated use can be attained through required technology controls or best management practices (Part 131.10(h)).

3 The RMP/EIS briefly addresses two of EPA's water quality concerns related to the KRA: 1) nonpoint source phosphorus-induced entrophication of Bear Lake and Flaming Gorge Reservoir, and 2) salinity in both the Bear and Green River drainages (pages 34, 112, and elsewhere). The alternatives chapter should describe how BLM is involved with the respective states in addressing these problems. The EIS should indicate that the Flaming Gorge Reservoir is EPA's highest priority water body in Wyoming for corrective actions and is listed as a priority in Wyoming's current Section 305(b) water quality assessment report. The RMP/EIS does not adequately describe the comparative level of beneficial effects of each alternative as they relate to these important environmental problems. How much of a reduction in salinity and phosphorus is targeted from BLM lands? According to page 34, "water quality plans will be developed to comply with the Colorado River Basin Salinity Control Act of 1974." The process and timetable for developing the plans need to be established in the RMP. What areas will be covered?

4 We believe that the discussion of management objectives for Alternative C in Chapters II and IV presents a strong and commendable intent to adequately manage watershed resources, and improve conditions where needed. We do suggest additional supporting documentation for the assertion

developed in conjunction with AMPs in areas with identified watershed concerns (e.g., accelerated erosion). Thus, WMPs will follow AMP development priorities. The specific goals, objectives, and time frames involved with future plans will be dictated by future concerns.

Response 37-6: Erosion control projects would be formulated and scheduled during watershed management plan (WMP) development. Existing erosion problems are being handled as development avoidance areas with improvement expected with implementation of AMPs and specific range improvement projects. Further improvement and watershed protection will be identified as goals in the WMP.

Response 37-7: We coordinate with the Corps of Engineers on projects that involve areas of the Corps' jurisdiction (e.g., the 404 program).

Response 37-8: Under Management Common to All Alternatives (Chapter 4), the degree of cumulative impacts associated with oil and gas well disturbance depends on a number of variables including slope and duration of the disturbance. The applicability and extent of these variables change by alternative (and the resulting cumulative impact). The cumulative impacts presented in Appendix G are projections based on existing management and past well data. To make specific inferences based on these variables and on the unknown number of wells that may be drilled would result in poorly defined data. Rather than specific projections, gradations are applied using Appendix G as a baseline. For examples, under Alternative A (Chapter 4), we feel that as development becomes more widespread, cumulative impacts would increase, tempered somewhat by expeditious stabilization. Further, under Alternatives B and C, due to improved reclamation practices and expected success, cumulative impacts would be minimized and lower than those in Appendix G. Alternative E projects an increase in reclamation success over Existing Management and results in lower levels of cumulative impacts.

Response 37-9: The RMP is designed to provide broad planning guidelines. Specific plans for new roads, timber sales, etc., are found in activity plans. This tiering concept is defined in the CEQ regulations. It enables us to adequately consider environmental concerns at each tier. Specific management practices will be developed and applied through site-specific analysis of timber sales, etc.

The statement on 100-foot buffer strips left room for interpretation and exception so that the guideline would apply to future planning but it could be waived if it is not necessary or reasonable in a specific case. For example, we would not want a firm, unchangeable requirement to prevent us from increasing the width if necessary or clearing

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that Alternative C would result in the elimination of "debris and high sediment carrying runoff velocities" (page 187).

As stated on page 76, watershed management plans would be done under Alternative C. We agree with this direction. Such a mechanism may be needed
5 to assure coordinated site-specific project priorities and objectives. Chapter II should indicate the priority areas to have such plans, the basic objectives to be accomplished, and the schedule for completion by alternative.

Chapter II should describe the planned erosion control projects, e.g., gully control, streambank stabilization, seedings, and other BMP's, by
6 alternative. Correlation of existing erosion problems (such as described on pages 110-111, and 121) to planned corrective measures should be clarified. We believe that such rehabilitation should be a high priority under the RMP.

We support Alternative C in requiring the installation of stream stability structures, such as rip-rap, where needed at crossings of perennial
7 streams (page 79). However, on page 25 the statement is made that such structures "should" be included. What is the accurate commitment? Alternative E (page 87) does not appear to require such stipulations. A related concern deals with the application of the Clean Water Act Section 404 dredge and fill program which is administered by the Corps of Engineers (COE). We suggest that the RMP describe the coordination between BLM and COE in application of the 404 program for projects that would affect streams and wetlands under COE jurisdiction. Mitigation measures that may be required under the 404 program should be recognized in Chapter II.

Cumulative erosion from oil and gas wells is given on page 311.
8 Chapter IV should address the cumulative impacts of such erosion more clearly.

We have several concerns regarding the planned logging activities that we would like to see addressed. We suggest that a map be included to locate
9 planned timber sale areas and new roads. We were unable to discern the potential water quality impacts of the logging because of a lack of information on: soil and water best management practices (BMPs); and on environmental impacts (Table S-2 and Chapter IV). The RMP/EIS states that the impact of logging roads on surface water "would be minimized" with use of BMPs (page 147). What does "minimized" mean in terms of water quality impacts? The necessary BMPs and other standards for logging should be described more specifically. The draft RMP/EIS states on page 40 that "Clearcuts generally will not be made within a 100-foot buffer strip on each side of a live stream." More specific criteria should be included on page 40 to assure adequate buffer strip widths. Other logging comments are under Riparian and Wetland Area Management.

The intent to manage for water quantity is mentioned on page 34.
10 However, the supporting program for maintaining adequate instream flows, such as the flows needed to protect the stream beneficial uses as assigned in the state water quality standards, should be described.

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Livestock/Vegetation Management

The EPA recognizes the importance of vegetation management in assuring sustained multiple uses and values of the rangeland ecosystem. We are
11 concerned that "estimated range condition is presently below acceptable standards in several areas throughout the KRA" (page 6). Evidently those conditions cover about half of the resource area (page 16). We were unable to determine more specifically: the ecological conditions, trends, and production impairments; and the condition improvement objectives. We suggest these existing conditions be mapped and addressed more completely in Chapter III and Appendix A-6, and that improvement objectives be described more specifically in chapters II and IV, and in Appendix A-6. We suggest clarification as to how watershed, water quality, and stream/fisheries condition criteria were used in selecting grazing allotments (Category "I" allotments) for improvement (pages 237-238). Furthermore, we believe that the monitoring plans for the "I" allotments (page 233) need to include provisions for monitoring other resource conditions that may relate to grazing management, such as erosion, sedimentation, fisheries, and stream habitat.

We have several concerns regarding vegetation management plans under the
12 preferred alternative. It is not clear from pages 21-22, 85-86, 202-203, and elsewhere, that it provides the management and criteria for protecting and improving, where needed, watershed and associated resource values. The objective of improving range condition on "I" allotments is stated on page 85. Yet it is stated on page 203 that condition trend would "stabilize or improve" under the preferred alternative. What is the accurate objective? About 82,610 acres of "vegetation manipulation" would take place under the preferred alternative (page 86). Under Alternative C, 33,800 acres would be burned to improve resource values. What are the cumulative environmental impacts from burning? The location of land to be sprayed, and the corresponding environmental impacts and multiple resource benefits from spraying need to be disclosed. The discussion of unavoidable adverse impacts and irreversible and irretrievable commitment of resources for livestock/vegetation management under Alternative E (page 203) are indicated to be the same as for Alternative B. This analysis needs to be described because it was not included under Alternative B on page 181. It is unclear why the commendable objectives for improving the multi-resource values associated with vegetation management (as discussed on pages 77, 187, 190, and elsewhere) under Alternative C are not preferrable to BLM. We have identified the need for additional analysis and information regarding Alternative C; however, based upon the information currently available, we believe that it would provide the assertive long-term rangeland ecosystem management intent needed in response to existing resource conditions and in response to Sections 102(a)(8) and (12), and 401(b)(1) of the Federal Land Policy and Management Act (FLPMA).

a stream of debris and fallen trees after a natural disturbance.

Response 37-10: At this time, the State of Wyoming has no official instream flow program. There has been enough water to meet instream flow needs.

Response 37-11: We are currently conducting a soil survey and range site inventory on our high priority "I" category allotments. A portion of this effort involves the determination of the ecological condition of the vegetative community. We are presently summarizing this information on the 500,000 acre Cumberland Allotment. This inventory will continue until range sites are determined for the entire resource area. Since this information was not available during preparation of the RMP, no maps could be prepared.

We intend to utilize the range site and condition classification information in the development of AMPs or monitoring plans. Through this process, allotment level objectives for all affected resources will be developed on each allotment. Monitoring systems will be tailored to measure progress of management actions towards attainment of these objectives (see Appendix A-4).

Response 37-12: During the development of AMPs, we will formulate specific allotment level objectives for all resource values that may be impacted by grazing. These AMPs will identify site-specific areas where vegetation manipulation is proposed. Each of these projects will be analyzed to determine the most cost effective, environmentally acceptable treatment method. No specific sites have been identified through the RMP but due to past performance in southwest Wyoming, we feel the use of prescribed fire may be one of the most preferred tools for these projects. The impacts of burning are described in several burn EAs available in the Rock Springs District as well as in Appendix E-2.

Response 37-13: The reference to "denuded range" was an oversight. It was deleted from the other alternatives because the data base used was an estimate of range condition. As previously stated, we are in the process of determining actual measured range condition on a large portion of the resource area and will utilize this information in later classification efforts.

Response 37-14: The data necessary to map groundwater resources were not available when the draft EIS was prepared. Groundwater resources are considered when proposed actions are reviewed. In the KRA, groundwater resources are used for deep well injection as well as for drinking and stock water.

Response 37-15: The wording was intended to

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13 At least 51,086 acres of "denuded range" is identified to have a "stable trend" under Alternative D on page 9 of the Summary chapter. How much of the resource area range is in this type of condition, and what are the associated environmental impacts? We suggest that the management objectives and corresponding environmental implications be addressed by Alternatives C and E.

Ground Water

14 We suggest that the location and quality of important ground water sources be mapped or otherwise identified more clearly in order to improve the effectiveness of using available information in designing adequate controls for activities that could potentially impact the resource. The description of the ground water resource on page 111 is unclear in identifying areas which will have stringent ground water protection measures enforced. Because the level of protection may vary, we suggest that BLM key in more specifically on locational needs.

15 According to the discussion on page 111, there appears to be minimal concern for the ground water resource, except in certain areas with local drinking and stock water uses. In such areas, the ground water should be protected with the most stringent measures. Alternative C appears to be the most stringent alternative. However, Chapter IV needs to identify potential impacts of each alternative (in more detail) in order to facilitate a better comparison of alternatives. Furthermore, the discussion of ground water under Irreversible and Irretrievable Commitment of Resources (pages 187 and 158) does not address the resource commitments.

16 Potential impacts from trona development activities on ground water are briefly discussed on page 146. The basic standards and guidelines to be applied at the activity plan stage for controlling and preventing such impacts need description in the RMP. The comparative levels of impact between alternatives also need to be described.

17 The RMP/EIS appears to have overlooked several programs that the State is implementing to protect ground water. The Underground Injection Control (UIC) program is designed to prevent ground water contamination from injection wells. Under the State's regulation of seismic operations, all seismic shot holes have to be plugged to meet specific criteria. These regulatory requirements should be addressed in the RMP/EIS.

Air Quality

18 Potential accidental releases of hydrogen sulfide at the wellhead or along natural gas pipelines are discussed. Air quality impacts which may result from malfunctions at sour gas sweetening plants also need to be discussed in the Environmental Consequences chapter. The Chevron Carter Creek plant and the Amoco Whitney Canyon plant have emitted substantial quantities

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of sulfur dioxide from malfunctions (as documented in State inspection reports). Anticipated malfunctions at the proposed Exxon Shute Creek plant may result in substantial sulfur dioxide emissions as well. Flaring of sour gas in the well fields may also result in significant releases of sulfur dioxide. Plant malfunctions and flaring in the well field generate high short-term concentrations of sulfur dioxide which may affect public health. Over a longer period of time, these emissions may also increase acid deposition. The BLM should consider the possibility of requiring a contingency plan in future leases pertaining to sour gas processing activities which would serve to minimize these emissions.

Riparian and Wetland Area Management

19 We realize, as does BLM, the value of riparian and wetland areas, as discussed on RMP/EIS page 6. One of the planning criteria is for all alternatives to "provide for maintaining wetland, riparian, and flood plain areas (administered by BLM) in current condition or better" (page 8). Yet on page 157, the BLM recognizes that riparian areas "have been severely impacted from overgrazing, oil and gas development, and the drop in water table due to headcutting problems." Such degraded conditions are also recognized on pages 121, 161, and elsewhere. Consequently, we do not agree that maintaining such poor conditions should be the goal.

Apparently the wetlands of the resource area are being described under the riparian communities on page 113. We suggest that the wetland areas be identified and described more specifically since riparian and wetland areas are not necessarily the same. Wetland areas are to be "inventoried and improved" for "waterfowl and sage grouse brood rearing" (page 36). We believe that the RMP should: 1) establish the wetland inventory and improvement schedules, and 2) assure that other multiple use values of wetlands are identified and managed accordingly. Will the U.S. Fish and Wildlife Service be mapping the wetlands under its National Wetlands Inventory?

Riparian area conditions for approximately half of the resource area were determined during 1975-78. The RMP should establish the schedule for surveying the riparian conditions for the remainder of the resource area.

20 We believe that the preferred plan should provide the management commitments and guidelines, particularly in the areas of riparian disturbances, erosion control, grazing management, and herbicide usage, to adequately provide for the protection, restoration, and sustained yield of multiple resource values of riparian and wetland areas. Yet we were unable to determine that the preferred alternative would provide such a management program. There needs to be substantially more documentation supporting the preferred alternative rate of 40 percent utilization by grazing of the riparian grasses. Documentation is needed to show that such a utilization rate will: 1) reverse existing declining trends, 2) adequately improve existing poor conditions, 3) maintain existing good conditions, and 4) will

inform the public that groundwater resources may be committed to use for deep-well injection of waste water. These proposals are evaluated on a case-by-case basis to ensure that sources of groundwater needed for other uses are not impaired.

Response 37-16: The draft EIS (page 31) summarizes the broad decisions that were previously made for sodium. The specific standards and guidelines to be applied at the activity plan stage are found in the Final Environmental Assessment for Sodium Mineral Development (May 1982). This EA was made available to the public as a Draft EA in August 1981. The guidelines are available at the BLM District Office and in the KRA office.

Response 37-17: We have not overlooked the Underground Injection Control program. This program is brought into play when injection actions are proposed. No deep well injection actions are proposed in the RMP.

Response 37-18: Air quality impacts which may result from actions at sour gas sweetening plants and well fields already permitted by state and federal agencies are an unpredictable part of the affected environment. This information is more appropriate for environmental documents on individual actions. Contingency plans are required in H_2S areas.

Response 37-19: Vegetation descriptions in the RMP are based on 1981 Landsat data which did not distinguish wetlands as a separate type. The only wetland survey data available for the KRA are referred to under the Waterfowl section (page 123 of the draft EIS). Future surveys for wetland and riparian areas will be completed in conjunction with monitoring of high priority areas (HMPs, AMPs), unless current funding levels are substantially increased.

Response 37-20: See Response 35-3.

Response 37-21: See Response 37-9.

Response 37-22: Existing pertinent fisheries and riparian survey data are presented in Appendix F. These data, in part, were used to identify and prioritize the "I" category allotments (Appendix A-6). These appendices and associated text present the available information on riparian and wetland condition within the KRA. Site-specific goals and objectives will be determined as AMPs and HMPs are prepared. For example, the Thomas Fork HMP is being implemented in the northwest section of the KRA to improve habitat for the Bear River cutthroat trout, a species proposed for listing as threatened or endangered. Other riparian and wetland areas will come under specific management as part of the proposed Kemmerer Riparian

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help provide adequate nonpoint source water pollution control. Based on communications with resource professionals, we believe that the 40 percent utilization rate proposed for Alternative C would be more effective for the sustained, multiple use improvements discussed on page 190. Possibly a lower utilization rate may be needed for some areas Chapter IV should clarify more specifically the long term riparian/wetland area objectives of the preferred alternative (considering the direction and intent of Executive Order 11990 on Protection of Wetlands). Additionally, the impacts to riparian/wetland area ecosystems resulting from herbicide runoff or drift from "vegetation manipulation" under the preferred alternative should be identified. Alternative C appears to be preferrable since vegetation manipulation would be by burning. The erosion control objectives (in the Alternatives and Environmental Consequences chapters) should be clarified.

21 Logging in riparian areas is addressed in general on page 40. We believe that more specific RMP stipulations and management criteria are needed in order to provide adequate direction for logging-related activity plans. For example, what are the BMPs for controlling and revegetating riparian area disturbances? What percent of tree removal with selective cutting methods is acceptable for riparian areas? When is selective cutting, the "preferred harvest method", not going to be used? Additionally, the standards for keeping logging roads out of riparian/wetland areas need to be identified.

Fisheries

Stream habitat condition trends were assessed for approximately half of the resource area in 1975-76. The EPA is concerned with the widespread stream
22 habitat degradation discussed on pages 120-121, and in Appendix F. The degree of fisheries degradation in each stream system evaluated should be described more clearly. The correlation of fishery condition to stream habitat condition, and existing water quality standards, i.e., the degree of fisheries designated use impairment, needs to be described. The RMP should establish the schedule for surveying the stream habitat/fisheries conditions for the remainder of the resource area. Additionally, we suggest that existing stream biotic and habitat condition be displayed in a table format.

Chapter II should describe the commitments and policies, by alternative, for stream habitat and fishery restoration efforts for the degraded stream segments. What are the improvement goals? Likewise, the Environmental Consequences chapter needs to disclose more clearly the comparative levels of stream habitat/fishery restoration and protection (including timeframes) by alternative. Practically the only direct reference to fishery impact disclosure under the preferred alternative is on page 204. There the statement is made that "increased erosion and lowered water quality would likely impact fisheries values in sensitive areas, such as the Thomas Fork drainage."

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We disagree with this management intent, as implied in the discussion of potential impacts to the Thomas Fork drainage (page 204). The Thomas Fork drainage is one example of a largely declining trend in stream habitat condition, with an extensive amount of poor condition riparian area and "accelerated erosion and sedimentation problems" (page 121). We strongly believe that the preferred alternative should provide more definitive policy and activity commitments to restore and improve such currently degraded streams.

Monitoring

We believe that the RMP needs to include a resource condition monitoring
23 program as an appendix (in addition to the rangeland monitoring program in Appendix A-4). We feel that the RMP/EIS development process (including public and inter-agency involvement) is the appropriate mechanism for defining these plans. At least the following monitoring components are suggested:

- The baseline water quality monitoring program should be described. What streams are to be monitored? What are the BLM-state monitoring roles? What will be the precision and reliability? What will be the criteria for taking corrective actions? The program for loading monitoring data into the STORET system for use in trends analysis should be stated.
- Monitoring requirements (field review, quantities, frequency, etc.) for evaluating the effectiveness of applied soil and water BMPs, and of riparian/wetland management practices, should be described.
- The fisheries and stream habitat monitoring program should be clarified. What are the biotic and habitat condition methodologies to be used? Where are the measurements to be taken? The monitoring program should also indicate acceptable condition indices and the degree of deterioration which will trigger improvement actions. Acceptable biotic condition methodologies are discussed in the Forest Service publication "Methods For Evaluating Stream, Riparian, and Biotic Conditions" (Platts et al. 1983). Methodology options for fisheries habitat evaluation include Binns' (1982) Habitat Quality Index or USFWS's PHABSIM program (Milhous et al. 1981).

and Cumberland Wetland HMPs (see pages 66 and 87).

Response 37-23: We gathered baseline information on chemical and physical properties from 19 creeks in the KRA. We plan to continue monitoring a smaller number of creeks for chemical and physical properties as well as for oil and grease (from creeks which drain the Overthrust). The number and specific creeks depends, in part, on where and when problems or opportunities for improvement develop. We are also beginning a program to monitor livestock watering facilities.

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United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO

L7619 (RMR-PP)

Memorandum JUL 1 - 1985

To: Team Leader, Rock Springs District Office, Bureau of Land Management, Rock Springs, Wyoming
Attention: Alan Stein

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Resource Management Plan/Environmental Impact Statement for the Kemmerer Resource Area, Bureau of Land Management (BLM) (DES 85/19)

We have completed our review of the subject document and offer the following comments.

1 Pages 9 and 10: Fossil Butte National Monument, an area administered by the National Park Service, is within the area covered by this plan. It is not, however, considered in the plan, even though BLM regulates grazing there, with consequent effects on wildlife.

2 Page 11: The statements of this paragraph seem to indicate that provisions of the alternatives may be negated by the "responsible official" without public or any other input. We suggest that changes to be made without public review be more clearly defined.

3 Page 32: The provisions listed have the effect of forcing a construction crew or bulldozer operator into making decisions on paleontological value and significance. Decisions of this nature would best be left to paleontologists. Three possible rewordings are:

1. Findings which are small, inconspicuous, and/or of insignificant scientific value could be specifically defined. The permits issued by the Wyoming State Geologist could serve as guidelines.

2. Reporting of all (especially vertebrate) paleontological finds should be required.

3. Have a paleontologist on hand whenever the Green River Formation is disturbed.

Page 41: National Historic Trail concerns are adequately addressed in the document.

4 Page 46 (Map 3): Part of Fossil Butte National Monument is incorrectly shown as a sheep grazing area.

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5 General: The following potential National Natural Landmarks (NNL's) are located within the Kemmerer Resource Area.

Ancient Lake Gasiute Sediments (Green River Overlook) - Sweetwater County

Adaville Barrier Island and Lagoonal Complex - Uinta County

Lone Tree Badlands - Uinta County

Hogback at Spring Gap - Uinta County

Oyster Ridge Hogback - Uinta County

Further planning for the Kemmerer Resource Area should take into account these potential designations and avoid impacts that could adversely affect the outstanding ecological and geological features of these areas. Information on the NNL program can be obtained from Ms. Carole Madison, Rocky Mountain Regional Office, National Park Service, P.O. Box 25287, 655 Parfet Street, Denver, Colorado 80225, telephone (303) 236-8699 or (FTS) 776-8699.

6 One final comment. Map number 2 (Historic Trails) should show the Pony Express Trail traversing the Kemmerer Resource Area from the point indicated in a southwesterly direction across Uinta County, connecting with the Mormon-California Trail segment at Fort Bridger.

We appreciated the opportunity to comment on this plan.

Richard A. Strait

Response 38-1: Current grazing authorizations on Fossil Butte National Monument are summarized in Appendix A-7. Future grazing proposals were not included in the Proposed Plan because, with the 1986 grazing season, the National Park Service has informed us that grazing authorizations will be terminated within the Monument.

Response 38-2: The exceptions to stipulations and requirements are described under each program.

Response 38-3: The text has been changed. Disturbance in the Green River Formation will require a paleontological survey and, if necessary, monitoring of construction and collection of specimens. Paleontologist must have an approved permit from the Wyoming State Office of BLM. Actions in other formations in the resource area will require a standard stipulation which requires reporting of any fossils discovered. Paleontological surveys may also be required in these other formations in some cases.

Response 38-4: We have corrected our base map to eliminate the error.

Response 38-5: The potential National Natural Landmarks need to be defined by area more closely and their significance evaluated to determine what management is needed. We will obtain more information on the areas, to address impacts in relevant site-specific analyses.

Response 38-6: The map will be corrected.

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DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS TEXAS 75242

Mr. Alan Stein, Team Leader
Rock Springs District Office BLM
P.O. Box 1869
Rock Springs, Wyoming 82902-1869

Dear Mr. Stein

Thank you for allowing us the opportunity to review the draft planning documents for Kemmerer Resource Area, Wyoming.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently no Air Force air operations traverse any portion of the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2527, or FTS 729-2527.

Sincerely

EDWARD LOPEZ, Chief
Planning and Intergovernmental
Affairs Branch

Cy to: HQ USAF/LEEV

PUBLIC HEARINGS

Two public hearings were held following publication of the draft EIS. The first was held in Kemmerer on May 13, 1985, and the second was held in Evanston on May 14, 1985. Transcripts of the hearings were reviewed and comments were summarized from statements made at the hearings.

The individuals who commented at the public hearings were assigned numbers sequentially, starting with number 40. As was done with the comment letters, each point the individual raised was also assigned a number.

Comment 40-1: Bill Taliaferro, a rancher representing the Green River Livestock Association, asked how the BLM proposes to justify or determine the 60 percent utilization figure on riparian areas.

Response 40-1: See Response 19-4.

Comment 41-1: Forest Hammond, of the Wyoming Game and Fish Department, asked what the BLM proposes to do when riparian areas exceed 60 percent utilization.

Response 41-1: There are several actions we can take if utilization exceeds our objectives on riparian areas or any other portions of the allotment. These actions may include herding, salting, fencing, deferment, changes in the season of use, changes in the kind of livestock, or a decrease in preference.

Comment 41-2: What steps do you take to protect the area?

Response 41-2: Protection of the area can most feasibly be accomplished through the implementation of a grazing system, which may or may not include fencing.

Comment 41-3: Is it BLM policy or policy for the KRA to wait a full 15 years before trying any kind of regeneration after a timber sale?

Response 41-3: Waiting 15 years before replanting is not a BLM policy. Nor is is the policy in the KRA. It has been found that, on an average, a timber stand will regenerate naturally in 9-10 years on BLM land in Wyoming. The 15 year period is generally what it takes for a timber stand to become fully stocked by natural regeneration. Monitoring of the stand will continue to take place prior to the 15 year period mentioned in the draft EIS.

Comment 42-1: Bob Northrup, of Chevron, questioned whether an active drilling rig will have to shut down due to a seasonal restriction.

Response 42-1: Generally, seasonal stipulations apply only to construction activities or the onset of drilling. If drilling begins before a seasonal stipulation is in effect, it would be allowed to continue except under unusual circumstances.

Comment 43-1: James Taylor, of Champlin, asked how the BLM proposes to make up for the loss of wildlife habitat (offsite mitigation).

Response 43-1: Offsite mitigation for a particular big game species will be designed to increase productivity or "carrying capacity" in part of a winter range during the time that another part of the winter range is unavailable to big game due to development activities. For example, a variety of methods of offsite mitigation are available which would increase the quality and productivity of winter forage. These include brush beating, prescribed fire, and fertilization.

Comment 44-1: Dick Loper, a consultant for the Wyoming State Grazing Board, questioned why the BLM considered the no livestock grazing alternative?

Response 44-1: It has been long-standing BLM policy that a No Grazing alternative be considered in each grazing EIS or RMP that also serves to meet the requirements on the court-ordered settlement on grazing.

Comment 44-2: Can we plant non-native species such as crested wheatgrass?

Response 44-2: According to the application of Executive Order 11987 (5/24/77), crested wheatgrass is not an exotic species. It has previously been introduced and is occurring naturally in many converted sagebrush-grassland vegetative communities. It is Wyoming State Office (BLM) policy to plant desirable native perennials where possible. Where instability and adverse conditions occur, crested wheatgrass may be used in interseedings or in mixtures, to stabilize the soil and establish cover. Plantings of pure crested wheatgrass and the resulting monostands will be avoided.

Comment 44-3: Poisonous and noxious weeds should be given more attention in the final EIS.

Response 44-3: We work with the counties in the weed control program.

Comment 44-4: More detail on the fire management program and the pros and cons with respect to fire management potential for fire hazard by alternative should be given.

Response 44-4: Baseline fire management costs are not expected to change markedly by alternative. Wildfire occurrence is primarily a function of weather and fuel, with weather being the more dominant variable. Fluctuations in fuel caused by different levels of grazing would not have a significant impact on the rate of wildfire occurrence in the KRA.

Comment 44-5: More details should be given on riparian management.

Response 44-5: The details on riparian management are developed on a site-specific basis. These activity plans would have to be in conformance with the RMP but the details are developed in plans.

Comment 45-1: T.L. Perryman, of Chevron, asked if the dispersion analysis for new H_2S development drilling is in our NTL 10.

Response 45-1: NTL 10 did not use the term dispersion analysis. Onshore Oil and Gas Order No. 2 will replace NTL 10. The portion of the Proposed Plan that deals with drilling in H_2S areas will require a contingency plan to help protect public health and safety.

Comment 46-1: Craig Kesselheim, of Medicine Butte Wildlife Association, stated that the BLM should use the 1984 Game and Fish Department's Annual Report for the figures in Table 3-14.

Response 46-1: The 1983 data from the Wyoming Game and Fish Department were used to prepare Table 3-14 because they were the most current at the time the draft EIS was prepared. Examination of the 1984 data did not reveal a significant change in recreational expenditures from 1983 to 1984. Therefore, the table was not revised.

Comment 46-2: BLM should identify the whooping crane and peregrine falcon in the KRA. Stipulations should be developed for the whooping crane.

Response 46-2: Threatened and endangered species were discussed in several sections of the RMP. We are currently cooperating with the Wyoming Game and Fish Department to protect important whooping crane habitat. "Areas of concern" for whooping cranes have been included in those areas receiving special seasonal restrictions on development activity.

Comment 46-3: BLM should withdraw critical winter ranges from oil and gas leasing.

Response 46-3: See Response 10-4.

Comment 46-4: BLM should set the threshold for disturbance in crucial winter ranges at zero not ten percent.

Response 46-4: The section of the Proposed Plan dealing with offsite mitigation has been rewritten. See Proposed Plan under Oil and Gas.

Comment 46-5: On page 33 of the draft EIS (paragraph 4) BLM states that "all reclamation is expected to be accomplished as soon as possible after the disturbance occurs. . . ." BLM should eliminate such ambiguous terms throughout the document.

Response 46-5: The language in the text is intended to describe the objective of the plan. It is also intended to provide the flexibility for a manager to decide when a requirement is either unnecessary or unreasonable. The purposes of the restrictions or requirements are to achieve a certain objective. They are not intended to be applied for their own sake.

Comment 47-1: Craig Sax, of the Wyoming Game and Fish Department, questioned what constitutes a 10 percent disturbance in critical winter ranges? The total disturbed area in the Overthrust was only 3-5 percent.

Response 47-1: The 10 percent threshold has been eliminated from the Proposed Plan. It now considers offsite mitigation for larger surface disturbances in all crucial winter ranges.

Comment 47-2: BLM should allocate AUMs to wildlife.

Response 47-2: We do not, at present, "allocate" forage to either livestock or wildlife. The amount of available forage on each allotment will be determined and compared to active preference. If, through monitoring, it is determined that sufficient forage is available to warrant an increase in management levels, the amount of the increase would be apportioned among wildlife, watershed, and livestock to satisfy allotment-specific objectives.

Comment 47-3: The 15 year period is too long to wait before revegetation on a timber sale.

Response 47-3: See Response 41-3.

Comment 48-1: Jeff Smith, of the Wyoming Game and Fish Department, stated that many riparian areas are in bad shape and there should be more emphasis on restricting wildlife and livestock use.

Response 48-1: Riparian areas on "I" category allotments will receive management consideration through the preparation of allotment management plans or monitoring plans. Riparian areas on "M" or "C" category allotments will receive no special consideration unless sufficient conflicts arise to warrant a recategorization to the "I" category.

ERRATA

The errata listed in Table 6-2 are changes that have been made to the text from the draft EIS. Some of the errata were included in the errata sent with the draft EIS; some of the errata were a result of responses to comments; and the remainder were a result of internal review of the draft EIS.

TABLE 6-2

ERRATA

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
Summary (1)	2	1	2	. . .practices **are** needed to address. . .
8	2	6	7	. . .will be **defined** for each alternative.
8	2	6	15	. . .will be proposed.
32	1	5	1	Operations causing disturbance **in the Green River Formation will require a paleontological survey and, if necessary, monitoring of construction and collection of species. The paleontologist must have an approved permit from the Wyoming State Office of BLM. Actions in other formations in the resource area will require a standard stipulation which requires reporting of any fossils discovered, as follows: "The holder of this authorization shall immediately bring any paleontological resources or fossils discovered as a result of operations under this authorization to the attention of the authorized officer. The holder shall suspend all activities in the vicinity of such discovery until notified to proceed by the authorized officer. The authorized officer will evaluate, or will have evaluated, such**

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				discoveries not later than 5 working days after being notified, and will determine what action shall be taken with respect to such discoveries. The decision as to the appropriate measures to mitigate adverse effects to significant paleontological resources will be made by the authorized officer after consulting with the holder. The holder may be responsible for the cost of any investigations necessary for the evaluation, and for any mitigative measures." In addition, if BLM has reason to believe that a paleontological survey is needed in formations other than the Green River Formation, a survey will be required.
33	2	pp	3	. . .or noxious weed seeds. **Straw mulch should contain fibers at least 8 inches long (i.e., facilitate crimping and provide greatest cover).**
40	1	2	15	. . .will be planted **whenever it is apparent natural regeneration will not result in a fully stocked stand and funding is available. It may take from 5 to 9 years to get a stand fully established.**
40	2	4	2	. . .activities are about **June 30** to December 1.
66	1	3		Logging activities **will allow for protection of riparian areas. Bridges, culverts, or low water crossings will be required for crossing perennial streams. During development of a specific timber harvest proposal, an adequate buffer strip will be left around live streams to prevent water quality deteriora-tion.**

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
70	1	4	13	. . .facilities will be **restricted** in the 25 percent to 40 percent slope areas (approximately 74,000 acres in the KRA) unless erosion controls can be ensured and adequate revegetation expected.
70	1	4	20-22	**Areas of greater than 40 percent slopes would be treated as "no surface occupancy" on a site specific basis** (approximately 68,000 acres in the KRA).
75	1	2	8	. . .require helicopters to avoid **disturbance of sensitive wildlife and habitat, such as wintering big game herds, whooping crane use areas, and sage grouse strutting grounds.**
84	1	4	13	Reestablishment of riparian vegetation would **always** be a key objective.
98	2	1	14	. . .oil shale and uranium (Sullivan 1980). **The Bridger Formation, containing fluvial sediments, was also deposited over large areas of the Basin. In addition, the Green River Basin contains deposits of oil and gas.** Large concentrations of. . .
99	2	4	7	reserves of five **groups of** Overthrust fields (Table 3-6).
100	1	1	replace all	**Based on all the data presently available to the BLM, the entire resource area has potential for oil and gas development. The coverage of the entire area by geophysical lines and the presence of wildcat drilling activity supports this view. Only two companies (Atlantic Richfield Co. and Marathon Oil Co.) provided ratings of the resource area. All areas in the KRA were rated by Atlantic Richfield as having high favorability for oil and gas development. Marathon Oil**

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				Company nominated the Raymond Mountain WSA as an area of critical mineral potential for oil and gas. Although hydrocarbons have not been found in commercial quantities in parts of the KRA, the geologic environment indicates a good potential for future discoveries. Based on the history of the Evanston area, which had a prolonged period of dry holes prior to major discoveries, we cannot assume a "low potential" for areas that have not yet yielded discoveries.
100	2	2	6	. . .**3,200.82** acres, and. . .
102	1	pp	2	. . .Coal Company (P&M) has **6,758.67 acres** under. . .
102	1	pp	5	. . .per year until the year **2009.** A large portion. . .
102	1	1	4	. . .**subbituminous**. . .
102	1	1	10	up on these projects is uncertain. **The South Haystack, Twin Creek, and North Block project areas are all leased for federal coal.**
102	2	1	8	. . .The **Wilkins**. . .
102	2	1	17	ending **September 30, 1984. was about 11,854,300** tons.
102	2	2		Roughly half of the area containing federal trona is leased. BLM is proposing to start new competitive leasing in 1985. **This will be based on an approved amendment to the Pioneer Trails MFP. Using 1984 as a base, demand for soda ash is projected to rise at 2 percent** per year through 1990.
102	2	3	3	. . .**Wilkins**. . .
107	1	pp	2	. . .beds in the **Wilkins** Peak and. . .

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
108	1	insert new paragraphs		. . .are no longer valid.
				In spite of the lack of locatable mining activity in the past, there are a variety of locatable minerals in the KRA. About 16 miles northwest of Kemmerer, copper staining in the Wells quartzite has been noted by Rubey (1975). Prospecting has been done there, although no mining claims are recorded with BLM for the area. The Nugget Sandstone, which outcrops in several areas of the Overthrust Belt of the KRA, has been found to contain copper, silver, and zinc in areas about 35 miles north of Kemmerer, Wyoming (Love and Antweiler 1973). Bentonite beds occur in the Frontier Formation of Cretaceous age (Hausel 1982). No mining has occurred and interest appears to be low.
				Along Oyster Ridge to the south of Kemmerer, a titanium deposit occurs in sandstones of the Frontier Formation (Hausel, et al. 1979).
				The Phosphoria Formation, which outcrops in north-south trending ridges in the Overthrust Belt, has been prospected for vanadium as well as for phosphate. An area about 14 miles northwest of Kemmerer has yielded rock samples containing 0.59 percent V_2O_5 (Rubey 1975). Vanadium is a strategic and critical mineral. Other minerals previously found in the Phosphoria include uranium, titanium, aluminum, magnesium, and iron (Coffman and Service 1967).
				Concentrations of claims. . .
108	1	3	5	. . .historically have been used in the KRA for **building materials, roads, etc.**
130	2	4	1	Paleoindian Period (Before **8,000** B.P.). . .

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
133	2	1	9	. . .Coal is utilized **in Lincoln County for the Utah Power and Light Naughton Power Plant and the FMC coke plant. In addition, coal is exported to trona plants and other facilities out of state.** Taxable coal. . .
138	2	1	12	. . .for Policy Research, 1982). **Up until 1895, however, the mining had been centered around Evanston.**
143	2	4	7	. . .Generally, on slopes of less than **25 percent,** successful reclamation. . .
153	2	1	3	. . .**being issued as a result of a**. . .
167	2	3	7	. . .In the event **oil and gas production increase**. . .
170	1	2	3	. . .**as new leases are issued with fewer**. . .
170	1	4	6	. . .Riparian areas would be **severely** impacted. . .
181	1	insert new paragraphs before Conclusion		**The impacts from fire management are the same as those described under Alternative A but there would be a greater short-term decrease in forage and long-term increase because up to 136,960 acres would be subject to prescribed fire rather than 82,610 as in Alternative A.** **Short-Term Use Vs. Long-Term Productivity** **Long-term impacts from geophysical exploration, oil and gas development, the coal program, etc. would be reduced. Reclamation of surface disturbances would favor production of forage for livestock. Limited short-term adverse impacts such as soil disturbance and vegetation removal would result from the development of range improvements and implementation of grazing systems. Long-term productivity would increase by approximately 46,414 AUMs as a result of these developments.**

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				The weed and pest control program would retard further spread of noxious weeds. Continued use of the sheep trails would reduce the impacts to the allotments being trailed through. The predator control program would enhance the long-term earning capacity of the livestock industry, in general, and the sheep industry in particular. The removal of the remaining 62 wild horses from the KRA would have a long-term, beneficial impact.
				Unavoidable Adverse Impacts
				Some short-term adverse impacts from surface disturbance and disruption of livestock operations would occur. These short-term impacts would be mitigated by increases in long-term productivity.
				Irreversible and Irretrievable Commitment of Resources
				Limited vegetation would be lost through minerals development. This would result in a small loss of forage for livestock.
				A more in-depth sour gas dispersion analysis and other protection measures would be undertaken on new gas fields with high H_2S potential, protecting livestock from sickness and death.
				Closure of muddy areas to vehicle use would create fewer impacts to vegetation and livestock forage than under Existing Management.
				Reclamation of temporarily disturbed areas would have virtually the same impacts to livestock and vegetation as those described under Existing Management. These areas include pipelines, roads, and abandoned oil and gas wells. Snow fencing and fertilizer applications would enhance

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				forage production on reclaimed areas. Vegetation condition would improve over the long term on these sites. **Offsite mitigation practices to favor livestock grazing would have desirable impacts. New range improvements would improve forage availability and quality for livestock.** **The impacts from timber harvesting operations are expected to be the same as those discussed under the Existing Management situation.** **The impacts of road construction would also be the same as under Existing Management except that upland areas and wet meadow areas would be protected.** **Impacts to livestock from ORVs would be similar to those described under Existing Management.** **Grazing leases in the Star Valley and near Evanston would continue to be administered by the Federal government. Livestock operators would not be adversely impacted through the Lands disposal program.** **Seasonal restrictions on rights-of-way construction in sheep lambing areas would limit adverse impacts to lambing operations. Sheep trailing routes would be protected from construction activities.** Conclusion An increase of approximately 46,414 AUMs would be realized. Poor to fair condition ranges on "I" category allotments would be expected to improve. "M" and "C" category allotments in poor to fair condition would be managed to prevent further deterioration. Riparian habitats would be managed for a stable trend in range condition.

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
181	1			FISH AND WILDLIFE HABITAT Impacts from geophysical exploration would similar to those outlined under the Existing Management alternative, with one exception. Reclamation of riparian areas would include reseeding with preferred livestock forage species. This would increase livestock use of riparian areas causing increased bank erosion, decreased channel stability and an overall decline in fisheries habitat. Impacts from oil and gas development would be the same as under Existing Management, except as described above and the expectation that additional reclamation requirements would have a more beneficial impact on wildlife in the long term than either Existing Management or Alternative A. Livestock production would be emphasized causing adverse impacts to big game range and riparian habitat. Water developments in winter ranges would concentrate livestock and wildlife use during the summer causing a reduction in forage availability for wintering big game. Spraying or burning to convert sagebrush to grassland in mule deer and antelope crucial winter range could reduce forage availability for those species if wildlife goals are not considered during planning. Adverse impacts to sage grouse would also occur from vegetation manipulation activities in nesting areas. Riparian areas would continue to receive heavy grazing pressure and would continue in a downward trend except where AMPs provide rest or deferment to these areas. Fisheries habitat would be degraded by increased livestock use of riparian areas. In the Smith's Fork Allotment, any

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				further decline in habitat quantity or quality for the Bonneville cutthroat trout may result in its being officially listed as a Threatened or Endangered Species.
				Completing the Woodruff Narrows HMP would maintain or improve bald eagle roosting habitat that supports from 40 to 200 wintering eagles.
				Retaining lands with grazing values would have the same impacts to wildlife as described for Existing Management.
				Impacts of rights-of-way management would be similar to Alternative A, except that fencing and blocking access would reduce road densities and improve reclamation success thereby benefitting wildlife.
				Short-Term Use Vs. Long-Term Productivity
				Surface-disturbing activities would result in about the same reduction in short-term productivity as under Existing Management. The provision which emphasizes livestock forage species in seed mixtures for reclamation would help return long-term productivity. However, the area may not be as beneficial to wildlife as it would under Existing Management.
				Unavoidable Adverse Impacts
				There would be both direct and effective habitat losses from surface-disturbing activities. This would occur to approximately the same degree as under Existing Management.
				Irreversible and Irretrievable Commitment of Resources
				No irreversible and irretrievable commitments of wildlife resources are expected.

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				Conclusion
				Oil and gas development and emphasis on livestock would reduce the long-term productivity of the resource area for wildlife and potentially for wildlife related activities (e.g., recreation). Wyoming Game and Fish objective numbers may not be met due to increased competition from livestock.
202	2	2	4	. . .expected to be significant.
				Unavoidable Adverse Impacts
203	2	insert new paragraphs after 2		**The impacts to wildlife from oil and gas development would be less than under Existing Management, but greater than under Alternative C. The Woodruff Narrows and Morgan Canyon bald eagle roosts would be protected from development by a "no surface occupancy" stipulation for public lands. The impacts to crucial big game winter ranges would be partially mitigated by habitat improvement projects designed to increase productivity within a herd unit impacted by development and by the addition of wildlife conditions to APDs in the most important parts of the crucial winter range. The impacts to riparian areas would be similar to those described under Alternative C. Direct habitat loss would be minimized in most cases by a 500-foot "no surface occupancy" stipulation; however, damage to riparian systems from increased erosion and lowered water quality would likely impact fisheries values in sensitive areas, such as the Thomas Fork drainage.**
				Adverse impacts from inadequate reclamation practices would be reduced from those identified under Existing Management.
				Improved soil stabilization on drill pads and rights-of-way, and the use of brush-beaters

READEX

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				whenever possible on pipelines would benefit wildlife habitat by reducing the time spent before forage and cover returned.
				The impacts from livestock grazing would be similar to Alternative A, except as follows. Conversion from sheep to cattle would be restricted in riparian areas to prevent a decline in condition. Before any conversions were allowed, a management plan would be completed showing how riparian areas would be managed in such a way to avoid causing adverse impacts. Utilization levels of key riparian grasses would be set at 60 percent maximum in all "I" allotments. This would still allow the use of specific grazing systems which deferred or rested pastures during periods and grazed at over 60 percent during others. This level of grazing is considered the maximum allowable to maintain riparian systems in fair condition without a declining trend.
				Impacts from ORV use, land disposals, and right-of-way management would be similar to those described under Alternative C.
203	2	3		Long-term productivity of wildlife in the KRA would be maintained or improved. Case-by-case stipulations would be designed to enable development activities to take place, while at the same time avoiding irreversible, irretrievable impacts to wildlife.
203	2	4	add new sentence	The impacts of disposing of lands in the checkerboard or other lands which meet FLPMA sale criteria and where disposal of the lands would not be inconsistent with other objectives of the RMP would be similar in type and magnitude

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
				to the impacts from disposal of the lands specifically identified in 1982.
203	2	insert new paragraph after 5		**If any withdrawals are revoked and the lands are managed as they were prior to revocation, the impacts are not expected to change. If any withdrawals are revoked and the lands are managed consistent with the objectives of this RMP, the impacts are expected to be similar to the impacts anticipated from managing other lands in the vicinity of the withdrawal.**
TABLE S-2				
5	6	3	6-8	**DELETE** short-term increase in labor and funds needed from permittee;
TABLE 2-1				
8	6	1	all	Before Construction: Review Surface Use Plan and **Point 10. Point 10 would be site specific (example Appendix C).**
9	6	1	1-5	Fencing is **required except where deemed unnecessary due to low grazing pressure. Additional erosion control measures may be required.**
10	3	1	6	40%+: **No surface occupancy on a site specific basis.**
TABLE 3-5				
100	1		6	50 - 300+
100	3	heading		Exposure Time in Seconds
100	4	heading		Effect
TABLE 3-6				
102	2	heading		Gas (Billion Cu. Ft.)
102	3	heading		Liquids (Million BBLS.)
TABLE 3-14				
126				See Chapter 3
TABLE 3-15				
127				See Chapter 3
TABLE 3-21				
134				See Chapter 3
TABLE 3-24				
137				See Chapter 3

TABLE 6-2 (continued)

PAGE	COLUMN	PARAGRAPH	LINE	SHOULD BE:
LITERATURE CITED				
209-210		additional entries:		
Coffman, J.S. and Service, A.L. 1967. *An Evaluation of the Western Phosphate Industry and Its Resources*, U.S. Bureau of Mines Report of Investigations, No. 6934.				
Hausel, W. Dan 1982. *Ore Deposits of Wyoming.* Preliminary Report No. 19, The Geological Survey of Wyoming.				
Hausel, W. Dan, et al. 1979. *Wyoming Mines and Minerals.* The Geological Survey of Wyoming.				
Love, J.D. and Antweiler, J.C. 1973. *Copper, Silver, and Zinc in the Nugget Sandstone, Western Wyoming.* Twenty-fifth Field Conference, 1973, Wyoming Geological Association Guidebook.				
GLOSSARY				
214	2	14	1-2	. . .formed in, **although not restricted to,** ancient lakes. . .
289	1		14	Hickey Mountain**(1)**
289		Footnote 3		***Gas** (measured in thousand cubic feet)

APPENDIX B-1

Wyoming State Office Approved Stipulations for Surface-Disturbing Activities (also Standard Stipulations for Oil and Gas Leases)

1. Surface Disturbance Stipulation

Surface disturbance will be prohibited in any of the following areas or conditions. Modifications to this limitation may be approved in writing by the Authorized Officer.

a. Slopes in excess of 25 percent.

b. Within important scenic areas (Class I and II visual resource management areas).

c. Within 500 feet of surface water and/or riparian areas.

d. Within a quarter mile or visual horizon (whichever is closer) from a historic trail.

e. Construction during periods when the soil material is saturated, frozen, or when watershed damage is likely to occur.

2. Wildlife Stipulation

a. To protect important big game ungulate winter habitat, drilling and other surface disturbing activity will not be allowed during the period from November 15 to April 30 within certain areas encompassed by this lease. The same criteria applies to elk calving areas from the period of May 1 to June 30. This limitation does not apply to maintenance and operation of producing wells. Modifications to this limitation in any year may be approved in writing by the Authorized Officer.

b. To protect important raptor and/or sage and sharp-tailed grouse nesting habitat, drilling and other surface disturbing activity will not be allowed during the period from February 1 to July 31 within certain areas encompassed by this lease. This limitation does not apply to maintenance and operation of producing wells. Modifications to this limitation in any year may be approved in writing by the Authorized Officer.

c. No surface occupancy will be allowed on that portion of the lease within the area (legal description) for the purpose of protecting (e.g., sage/sharp-tailed grouse strutting, and/or other species activity) habitat. Modifications to this limitation in any year may be approved in writing by the Authorized Officer.

3. Special Resource Protection Stipulation

In order to protect (resource value), the District Manager reserves the right to prohibit surface disturbance (i.e., within a specific distance of the resource value or between date-to-date) in (legal subdivision). This limitation does not apply to operation and maintenance of producing wells. Modifications to this limitation may be approved in writing by the Authorized Officer.

Resource Category (select category and identify specific resource value):

a. Recreation areas.

b. Special historic features.

c. Special management areas.

d. Sections of major rivers.

e. Prior existing rights-of-way.

f. Occupied dwellings.

4. No Surface Occupancy Stipulation

No surface occupancy will be allowed on the following described lands (legal subdivision/area) because of (resource value) (see examples).

Resource Category (select category and identify specific resource value):

a. Recreation areas (campgrounds, historic trails, national monuments, etc.).

b. Major reservoirs/dams, etc.

c. Special management areas (ACEC, wild and scenic rivers, etc.).

APPENDIX B-1a

Conditions for APD Approval

1. The top _____ inches of topsoil will be stripped and stockpiled. This will amount to approximately _____ cubic yards of material which will be stockpiled.

   The operator is responsible for establishing an acceptable stand of vegetation. The seed mix, based on pure live seed, will be as follows:

   Seed should be planted after September 1 and prior to ground frost, or seed should be planted after the frost has left and before May 15.

   Fall seeding is best. All seed must be drilled on the contour at a depth of ¼ to ½ inch. Slopes too steep or rocky for machinery can be broadcast and the seed hand-raked into the soil. When broadcasting the seed the rate per acre should be doubled.

2. To maintain esthetic values, all semi-permanent and permanent facilities will require painting or camouflage to blend with the natural surroundings.

   Unless a change is mutually agreed upon, the following permanent facilities will be painted _____ which is a standard color reference number from the Munsell Soil Color Charts. Typical facilities that would require painting might include all high level equipment such as tanks, separators, heater treaters (except fire box and stack), large flow lines (above 4 inches), and equipment buildings. Small size flow lines, low level equipment, and small or galvanized wire and pipe not normally painted may not require painting. If this type of equipment is normally painted or was painted during previous use, color contrast will be evaluated using the current painting requirements. It is desirable that as much equipment as possible be painted a uniform noncontrasting color.

   Permanent structures are considered to be those facilities which are on site more than ninety (90) days after completion of the well.

   The surface management agency will select appropriate colors from the standard colors shown in Table B-1-1. The number in parentheses refers to Munsell Soil Color Charts.

3. Standard Paleontological Stipulation - refer to "Paleontological Resources" section of the Proposed Plan.

4. The holder of this authorization shall immediately bring any paleontological resources or fossils discovered as a result of operations under this authorization to the attention of the authorized officer. The holder shall suspend all activities in the vicinity of such discovery until notified to proceed by the authorized officer. The authorized officer will evaluate, or will have evaluated, such discoveries not later than 5 working days after being notified, and will determine what action shall be taken with respect to such discoveries. The decision as to the appropriate measures to mitigate adverse effects to significant paleontological resources will be made by the authorized officer after consulting with the holder. The holder may be responsible for the cost of any investigations necessary for the evaluation, and for any mitigative measures.

5. Construction of roads or drill pads with frozen earth material mixed with snow and ice, or muddy earth material will not be allowed.

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